

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
v.	§	CIVIL NO.
	§	
ASSORTED COINS & COLLECTIBLE	§	
MEMORABILIA,	§	
Defendants.	§	

VERIFIED COMPLAINT FOR CIVIL FORFEITURE
IN REM AND NOTICE TO POTENTIAL CLAIMANTS

Now comes Plaintiff, the United States of America, and files this action for forfeiture *in rem* against the above-entitled Defendant Properties. The United States respectfully alleges on information and belief as follows:

NATURE OF THE ACTION

1. This is a civil action for forfeiture in rem against the Defendant Property pursuant to 18 USC § 981(a)(1)(C) and 18 USC § 981(a)(1)(A).

JURISDICTION AND VENUE

2. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1345 and 1355. The Defendant Properties are located in the Southern District of Texas or are forfeitable due to acts and omissions occurring within the Southern District of Texas and are therefore within the jurisdiction of this Court.

3. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1355, 1391(b) and 1395(a) and (b).

THE DEFENDANT PROPERTIES SUBJECT TO FORFEITURE

4. The Defendant Properties are described as follows:

- a) Miscellaneous coins from 508 W. Griffin Parkway, Suite B, Mission, Texas;
- b) Miscellaneous bank notes from 508 W. Griffin Parkway, Suite B, Mission, Texas;
- c) Miscellaneous collector trading cards from 508 W. Griffin Parkway, Suite B, Mission, Texas;
- d) Uniform, hat and sword from 508 W. Griffin Parkway, Suite B, Mission, Texas; and
- e) Miscellaneous paintings, prints, photos, posters, historical documents, and memorabilia from 508 W. Griffin Parkway, Suite B, Mission, Texas,

(collectively, the “Defendant Properties”, see Attachment A for full listing, attached hereto and incorporated by reference).

STATUTORY BASIS FOR FORFEITURE

5. The Defendant Properties are subject to forfeiture under 18 USC § 981(a)(1)(C) and 18 USC § 981(a)(1)(A). The Defendant Properties are subject to forfeiture under 18 USC § 981(a)(1)(C), which provides for the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to specified unlawful activity as defined in 18 USC § 1956(c)(7)(F), a Federal Health Care Offense. 18 USC § 1347, as well as 42 USC § 1320a-7b, Healthcare Fraud, are both defined as a “Federal Health Care Offense” pursuant to 18 USC § 24(a)(1).

6. The Defendant Properties are also subject to forfeiture under 18 USC § 981(a)(1)(A), which provides for the forfeiture of any property, real or personal, involved in a transaction or attempted transaction in violation of section 18 USC § 1956, or any property traceable to such property. 18 USC § 1956(c)(7)(F) defines specified unlawful activity as a Federal Health Care Offense. 18 USC § 24(a)(1) defines both 18 USC § 1347 and 42 USC § 1320a-7b (Healthcare Fraud) as a Federal Health Care Offense. Thus, violations of 18 USC § 1347 and 42 USC § 1320a-7b are specified unlawful activity for purposes of 18 USC § 1956. Here, there are facts as alleged that show that funds associated with violations of 18 USC § 1347 and 42 USC §

1320a-7b were transacted in a manner to disguise their origin and purpose in violation of 18 USC § 1956 (a)(1)(B)(ii), and to promote the unlawful scheme in violation of 18 USC § 1956 (a)(1)(A)(i). In addition, this action is brought pursuant to 18 U.S.C. § 981(a)(1)(A), which also provides for the forfeiture of property involved in a violation of 18 U.S.C. § 1957. Section 1957 makes it unlawful to engage in monetary transactions of greater than \$10,000 in proceeds derived from specified unlawful activity.

FACTUAL BASIS FOR FOFEITURE

Background and Summary of Alleged Fraud Schemes

7. Dr. Francisco Javier Zarzar (“Zarzar”) is a medical doctor with a stated specialty in pediatrics. Zarzar was the sole physician at the Zarzar Pediatric Clinic, located at 508 W. Griffin Parkway, Suite B, Mission, Texas, 78572 (“the Clinic”). Zarzar operated the Clinic under the business entity Francisco J. Zarzar M.D.P.A. The Clinic’s stated hours of operation were Monday through Friday, 10:00 AM to 5:00 PM. According to employees of the Clinic, Zarzar did not employ any nurse practitioners (NPs), physician assistants (PAs), or registered nurses (RNs) at the clinic. As such, during the conduct alleged in this Complaint, Zarzar was the only medical practitioner at the clinic authorized to issue prescriptions for medications and perform medical services for patients. Employees also stated that most of Zarzar’s patients were covered by Medicaid for health insurance. The Federal Bureau of Investigation (FBI) is the investigating agency in this matter.

8. **Kickback Scheme.** Beginning in or about 2018, Zarzar, through the Clinic, engaged in a kickback scheme whereby Zarzar agreed with the owner of a pharmacy to write specific prescriptions to be filled at the pharmacy and provide testing services. In return, Zarzar received monetary compensation from the pharmacy owner for the business Zarzar generated for

the pharmacy. Engaging in such a scheme is in violation of Title 42 U.S.C § 1320a–7b. Prescriptions written by Zarzar as part of the kickback scheme constituted a significant portion of the Clinic’s prescribing, generated significant illicit proceeds both for the pharmacy and Zarzar, and were pervasive to the point that the kickback scheme comprised a substantial portion of the Clinic’s operations.

9. **Billing Fraud Scheme.** Beginning in or about 2018, Zarzar, through the Clinic, engaged in a scheme to defraud Medicaid whereby Zarzar would bill Medicaid for services not justified by the level of care Zarzar provided patients at the Clinic. Specifically, Zarzar billed Medicaid for services not justified based on the time spent with patients and detail of the care provided, according to statements provided and records reviewed by investigators. Engaging in such a scheme is in violation of Title 18 U.S.C § 1347. Zarzar’s fraudulent billing practices constituted a significant portion of the Clinic’s revenue, generated significant illicit proceeds, and were pervasive to the point that the billing fraud scheme comprised a substantial portion of the Clinic’s operations.

10. **Money Laundering Schemes.** Beginning in or about 2018, Zarzar, and others, engaged in a scheme to conceal the source and nature of the kickback payments paid to Zarzar for sending prescriptions specifically to one pharmacy. Zarzar and others did so by providing Zarzar with checks and payments sourced from multiple bank accounts related to multiple business and other entities. Zarzar also deposited the payments in multiple accounts. Engaging in such a scheme is in violation of Title 18 USC § 1956(a)(1)(B)(ii). This conduct also is in violation of Title 18 USC § 1956 (a)(1)(a)(i), in that the transactions themselves represent proceeds of the kickback scheme intended to continue or promote the scheme itself by remunerating Zarzar for prescriptions and induce the scheme’s continued operation. Zarzar, and others, also received and made payments

constituting illicit proceeds over \$10,000 as part of the above schemes in violation of Title 18 U.S.C. § 1957.

THE KICKBACK SCHEME

11. Beginning in or about 2018, Zarzar, through the Clinic, engaged in a kickback scheme whereby Zarzar agreed with the owner of TLC Pharmacy and Medical Equipment #2 (“TLC #2”) to write specific prescriptions to be filled at the pharmacy. Zarzar and the owner of TLC #2, Jose Alberto Vela (“Vela”), agreed that Zarzar would receive monetary compensation for the business Zarzar generated for TLC #2. Zarzar then wrote numerous prescriptions to TLC #2, and pressured patients to use TLC #2 for their medication needs. Zarzar and Vela also agreed to have Zarzar provide testing services at TLC #2 that Zarzar did not, in fact, supervise as required. Zarzar then received regular payments from Vela in return for the prescription referrals and the testing services. Prescriptions written by Zarzar as part of the kickback scheme constituted a significant portion of the Clinic’s prescribing, generated significant illicit proceeds to both TLC #2 and Zarzar, and were pervasive to the point that the kickback scheme comprised a substantial portion of the Clinic’s operations.

12. Zarzar also participated in related money laundering activity. Beginning in or about 2018, Zarzar, Vela, and others, engaged in a scheme to conceal the source and nature of the kickback payments paid to Zarzar for sending prescriptions specifically to TLC #2. Zarzar, Vela, and others did so by providing Zarzar with checks and payments sourced from multiple bank accounts related to multiple business and other entities, which Zarzar deposited into multiple accounts. These transactions were likely designed to obscure the source and purpose of the funds, and also represent proceeds of the kickback scheme intended to continue or promote the scheme

by remunerating Zarzar for prescriptions and induce the scheme's continued operation. Zarzar also received payments constituting illicit proceeds over \$10,000.

Zarzar Pressured Patients to Obtain Their Prescription Medications From TLC #2

13. Employees of the Clinic stated to investigators that Zarzar often insisted that his patients obtain their prescription medications from TLC #2. Rather than allow patients to choose which pharmacy they wished to receive their prescription medications from, Zarzar treated TLC #2 as the Clinic's default pharmacy and informed patients that he would send their prescriptions there. If patients expressed a desire to use a different pharmacy, Zarzar relied on a series of tactics to try to convince patients to use TLC #2, at different times saying that TLC #2 offered free delivery services and covered prescriptions that other pharmacies would not. Zarzar also informed patients that TLC #2 could understand Zarzar's handwriting (whereas other pharmacies could not).

14. According to one employee, Zarzar provided TLC #2 business cards to patients. The employee never saw Zarzar provide business cards for any other pharmacies or recommend any other pharmacies to patients. Clinic staff were often responsible for handing out the business cards to patients. There were no business cards for any other pharmacy available.

15. Representatives of Medicaid beneficiaries whose prescriptions were written by Zarzar and filled by TLC #2 also provided statements to investigators. Representative 1 (RP 1) had knowledge of two patients at the Clinic ("Patient 1 and 2"). According to RP 1, Zarzar prescribed multiple medications to Patient 1 and 2. RP 1 had never heard of TLC #2 until Zarzar recommended that Patient 1 and 2 receive their medication from the pharmacy because it offered a home delivery service. Before switching to TLC #2, RP 1 used a national pharmacy chain for Patient 1 and 2 prescription needs. RP 1 recalled paying a copay for some medications when obtaining them from the national chain, but upon switching to TLC #2, there was no longer a copay

for the same medications. Whenever TLC #2 delivered medication to RP 1's home, the medication was accompanied by an invoice showing that the cost of the medication as \$0.00 U.S. Dollars. RP 1 believed that Zarzar "always prescribe[d] a lot of medication", even after RP 1 informed him that the previous month's prescription had not run out and did not need more of the same medication.

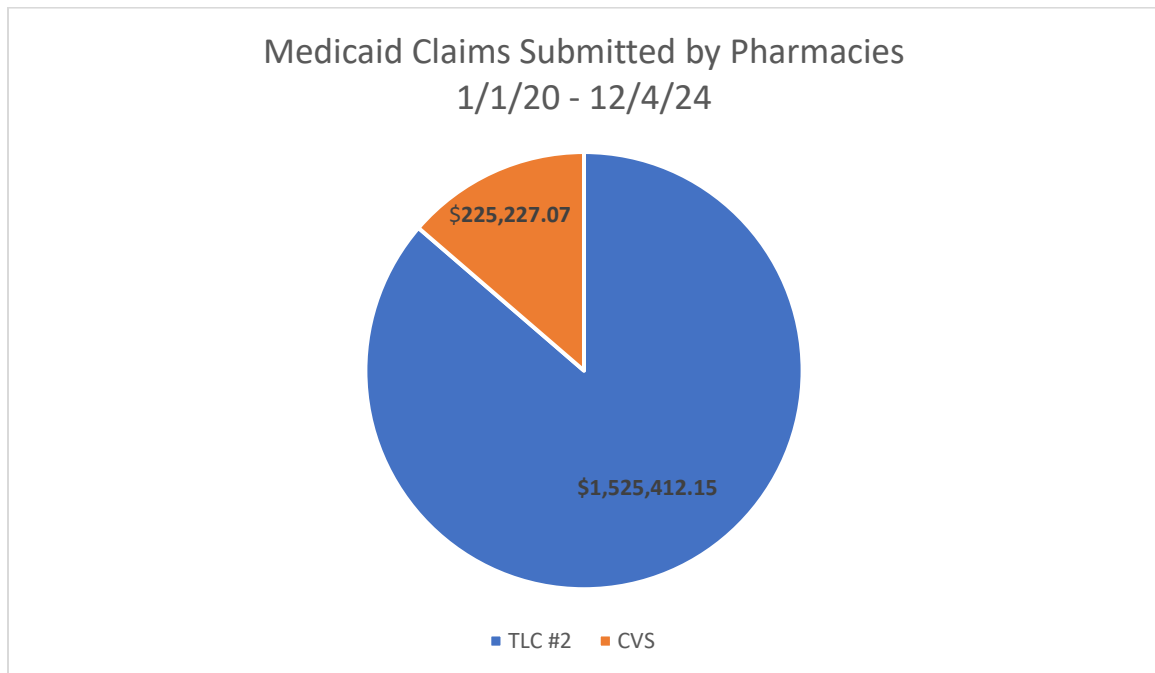
16. Representative 2 ("RP 2") had knowledge of a patient at the Clinic who received prescriptions as well ("Patient 3"). RP 2 stated that Patient 3's prescriptions were also switched to TLC #2 after visiting the Clinic. RP 2 indicated that Patient 3's prescriptions were switched because it was more convenient. RP 2 stated that TLC #2 never required a co-pay, whereas other pharmacies did.

17. According to the website for the Texas State Board of Pharmacy, which was accessed most recently by investigators on November 13, 2024, TLC #2 is an actively licensed pharmacy located at 1242 E. Highway 83, Suite 7, Mission, Texas, 78572. The Pharmacist in Charge for TLC #2 is listed as Vela. The owner is listed as Moron Vela, Inc., and Vela is listed as one of two officers for Moron Vela, Inc.

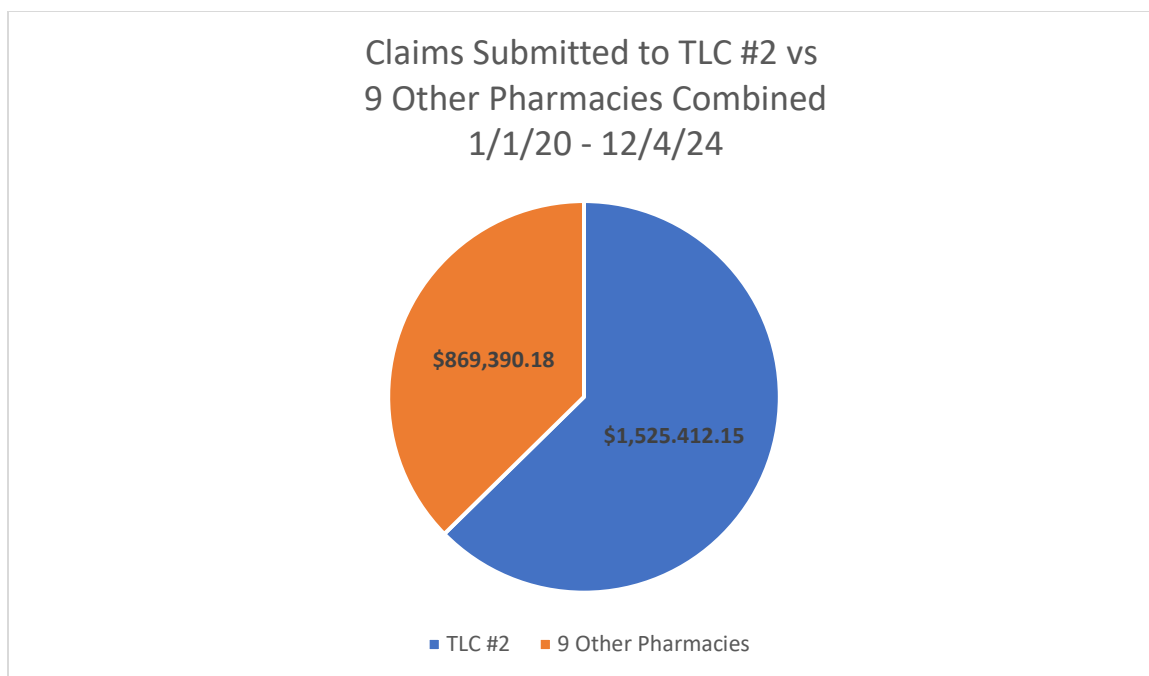
18. Investigators analyzed aggregated Medicaid claims data from the period January 2018 to December 2024, for prescriptions written by Zarzar. In 2018 and 2019, TLC #2 was the pharmacy which filled the second most prescriptions written by Zarzar (second only to another pharmacy which has since closed, Queen Pharmacy), both in terms of number of prescriptions and total amounts billed to Medicaid for the prescriptions.

19. Beginning in 2020, Zarzar ceased referring patients' prescriptions to Queen Pharmacy but continued to refer prescriptions to TLC #2. During the period January 1, 2020 to December 4, 2024, TLC #2 submitted \$1,525,412.15 in billing claims to Medicaid for

prescriptions written by Zarzar, representing 22,816 claims for 1,007 unique beneficiaries. The second-highest recipient of prescriptions written by Zarzar was a CVS Pharmacy located at 2300 N. Conway Avenue, Mission, TX, just one-half mile from Zarzar's clinic. CVS submitted \$225,227.07 in billing claims for prescriptions written by Zarzar during the same time period, representing 3,838 claims for 315 unique beneficiaries – a small fraction of the claims submitted by TLC #2.



20. Investigators also totaled the top 10 pharmacies which filled prescriptions written by Zarzar for the stated time period, finding that claims submitted by TLC #2 to Medicaid (\$1,525,412.15) surpassed the total claims submitted by the other nine pharmacies combined (\$869,390.18) during the same period:



21. Based on the review of claims data by investigators, Zarzar did not generally target one particular medication for referral to TLC #2 for the duration of the scheme, but rather generally adopted the practice of referring as many patients' prescriptions as possible to the pharmacy TLC #2.

Vela Directed Zarzar's Prescribing Patterns

22. Investigators also found evidence that Zarzar took direction from Vela regarding which medications to prescribe to his patients based on the best interest of TLC #2 rather than that of Zarzar's patients.

23. Investigators reviewed text message conversations between Vela and Zarzar, and between Vela and TLC #2 employees, which were stored on a mobile device seized from Vela pursuant to a federal search warrant in June 2024. In messages dated September 6, 2020, Zarzar asked Vela to send him a "pic with the preferred drugs someone misplaced my copy." Vela replied with "Napralen Bactroban crm nystst triamc pulmicort Advair astelin nasonex accuneb pataday" and supplemented the list with "Triamcinolone cream or oint." and "Desonide oint would be

great.” Just a few minutes later, Zarzar sent Vela photographs of two prescriptions to be filled at TLC #2 which included four of the drugs from Vela’s list: Triamcinolone cream, Desonide ointment, Nasonex, and Accuneb.

24. In messages dated December 16, 2020, Zarzar sent Vela a photograph of a prescription for Naprelan that a patient wished to pick up at the pharmacy. Zarzar also reminded Vela that he would prescribe anything Vela requested, saying, “Anything you prefer let me know and I just document in chart.”

25. In messages dated January 25, 2021, Zarzar sent Vela three photographs of prescriptions to be filled for three different patients. One of the prescriptions was for Naprelan, a medication which Vela had previously indicated to Zarzar was on his list of preferred drugs. Zarzar told Vela “Please o [sic] convinced her for naprelan.” Based on the conversation, it appeared that the patient did not need the medication, but Zarzar nonetheless issued the prescription for the purpose of satisfying Vela’s financial interest.

26. In messages dated May 13, 2021, Vela requested that Zarzar “add something to this one,” referring to a prescription Zarzar had written for Motrin earlier in the day. Vela sent Zarzar a photograph of the prescription label showing that TLC #2 would only be reimbursed \$0.39 for the prescription and told Zarzar “39 cents doesn’t even cover the tabs.” Zarzar agreed to prescribe additional medication. Although Zarzar and Vela did not further discuss this patient’s medications in the text messages, a review of claims data showed that TLC #2 also filled prescriptions for Allantoin lotion 0.5%, OralYTE oral electrolyte solution, and Off Deep Woods aerosol bug spray for the same patient on the same day. TLC #2 was reimbursed \$25.03 by Medicaid for all four medications.

27. In messages dated April 19, 2024, Vela instructed Zarzar to begin prescribing Histex for patients with cough and cold symptoms instead of Vanacof because Vanacof was on backorder. Vela also said he would send a Histex marketing representative to visit Zarzar the following week. Although both Histex and Vanacof are used to treat similar symptoms, they are different drugs and contain different active ingredients.

28. Investigator review of the above messages indicates that Vela directed Zarzar to prescribe medication with desirable profit margins, that Zarzar's patients did not know that Zarzar was being compensated by Vela for specific prescriptions, and that Zarzar was prescribing medication to his patient based on Vela's preference rather than Zarzar's independent review and examination of the patient. Through these acts, Zarzar placed an undue financial burden on Medicaid.

Zarzar Received Kickbacks for Prescriptions and Concealed the Nature of Payments

29. Investigators analyzed bank records related to Zarzar, Francisco J. Zarzar M.D.P.A., Moron Vela, Inc. (the company that owns TLC #2), and other pharmacies and businesses in which Vela has an ownership or business interest. Investigators identified approximately 85 checks issued by Moron Vela, Inc. (55 checks) or other business entities owned by or associated with Vela (30 checks) and negotiated by Zarzar for a total of approximately 85 checks for \$174,873 between January 2018 and September 2024. While four of the checks indicated the purported purpose of the check in the memo section (such as "COVID" or "loan"), the memo section was left blank on the remaining 81 checks. The signature on 83 of the 85 checks appeared to be Vela's.

30. The first two checks were issued to Zarzar in January 2018 from Vela's personal bank account. Zarzar then received more checks from Vela starting in June 2020, including from a Moron Vela, Inc., bank account.

31. The 85 checks ranged in value from \$215 to \$10,000 each. All of the checks had values expressed in dollars with no cents. All of the checks except one were written for amounts in increments of \$5 or \$10. It is unusual for a pharmacy or pharmacist to provide recurring payments in round dollar amounts with no legitimate business purpose indicated on the check.

32. Employees of Zarzar's clinic were unaware of any legitimate business relationship between Zarzar, Vela, and Vela's entities that would explain the payments from the pharmacy-owner to Zarzar, according to statements given to investigators. Investigators' review of the bank records did not suggest a legitimate business reason for the payments.

33. Investigators also reviewed text message conversations between Zarzar and Vela stored on both individuals' mobile devices which collectively spanned parts of the years 2020, 2021, 2022, and 2024. Investigators identified two discussions in which Vela agreed to lend Zarzar money. According to those discussions, in January 2021, Vela lent \$20,000 in cash to Zarzar. Then, in late April 2024, Zarzar asked for another \$20,000 loan at 7% interest. Vela agreed to the loan, but at 10% interest, with half the funds to be paid to Zarzar in cash and the other half to be paid via a Lone Star National Bank check. On 4/30/2024, Vela issued Zarzar a check for \$10,000 drawn on his personal bank account at Lone Star National Bank. No other loan arrangements were seen in the text messages.

34. A total of 13 different entities, including pharmacies, adult daycare centers, and investment companies, issued checks to Zarzar during the time-period of the alleged scheme.

35. Zarzar's handling of the payments from Vela and entities related to Vela do not appear consistent with a legitimate business purpose. According to bank records reviewed by investigators, many of the checks issued by Vela to Zarzar were endorsed and cashed by Zarzar but never deposited into any of Zarzar's bank accounts.

Vela Paid Zarzar Kickbacks for TLC #2's COVID-19 Testing Program

36. In reviewing Zarzar's bank records, investigators observed that in or about October 2020 and ending in or about August 2021, Zarzar began receiving checks approximately once a week from Moron Vela Inc. The 43 checks received by Zarzar during this period constitute a subset of the 85 checks from Vela's entities described above. The amounts of these checks ranged from \$215 to \$2305 and totaled approximately \$45,260. Unlike the other checks Zarzar received from Vela, which were usually issued for amounts in increments of \$500 or \$1,000, the precise amount of the checks varied from one week to the next.

37. Investigators identified a text message conversation between Zarzar and Vela on October 12, 2020, discussing how Vela will compensate Zarzar in exchange for serving as lab director to oversee TLC #2's testing program related to COVID-19. Vela offered to pay Zarzar either a flat fee or on a per-test basis.

38. In order for TLC #2 to function as a laboratory and perform COVID-19 tests, it needed to be certified under the Clinical Laboratory Improvement Amendments (CLIA) program, which is administered by the Centers for Medicare and Medicaid Services (CMS) in conjunction with the Texas Health and Human Services Commission. A laboratory could also apply for a CLIA waiver to perform COVID-19 tests which had been granted an Emergency Use Authorization (EUA) by the United States Food and Drug Administration (FDA). According to CFR § 493.1405, a laboratory director for a laboratory performing tests of moderate and high complexity (the

categories which included COVID-19 diagnostic tests before obtaining an EUA) must be a medical doctor or possess another qualification acceptable under the statute.¹ A Doctor of Pharmacy degree, which Vela purports to hold, does not qualify under the statute to serve as lab director absent some other acceptable qualification. Therefore, Zarzar possessed the requisite qualification to serve as laboratory director, but Vela did not.

39. A laboratory director for the purposes of CLIA is “responsible for the overall operation and administration of the laboratory, including the employment of competent qualified personnel.”² Although the lab director may delegate certain tasks to personnel with the necessary qualifications, there are many oversight responsibilities which the lab director cannot delegate.

40. Zarzar indicated to Vela that he understood at least some of his responsibilities as lab director, stating in a text message on October 12, 2020, “As lab director I’m responsible for the exactness and quality control of the testing.”

41. However, subsequent text messages from November 2020 undermine the legitimacy of the arrangement. On November 14, 2020, Vela told Zarzar, “Oh ok this is the last week of using ur name then we will start doing the clia fee thru tlc no more dr z arrangement.” Later in the same conversation, Zarzar convinced Vela to continue the arrangement. Vela spelled out why he wanted to end the arrangement and how he intended to compensate Zarzar going forward: “I will still do the 5 if u but u start sending me bills for no reason when u were making easy 5k dollars and then u wanted more and was acting up.” Based on the conversation, “still do the 5” likely meant Vela would continue to pay Zarzar \$5 for every COVID-19 test performed by TLC #2 while using Zarzar as lab director, and that “easy 5k dollars” referred to the approximately

¹ <https://www.ecfr.gov/current/title-42/section-493.1405>

² <https://www.cms.gov/regulations-and-guidance/legislation/clia/downloads/brochure7.pdf>

\$5,000 per month that Vela paid Zarzar by issuing weekly checks from Moron Vela, Inc., to Zarzar without Zarzar needing to do any of the work that a lab director would be expected to perform.

42. In a separate text message conversation between Vela and Zarzar in October 2020, Vela sent Zarzar a photograph of a sticky note with a series of numbers written next to the days of the week for one week which added up to 256. A few days later, Vela issued Zarzar a check for \$1,280. This amount is equivalent to 256 tests performed multiplied by \$5 for each test.

43. Investigators determined that Zarzar, as lab director, would have been expected to communicate about the laboratory testing program with TLC #2. However, the only communications between Zarzar and Vela about the program which were identified by investigators dealt with Zarzar's compensation and procurement of COVID-19 testing supplies from third-party vendors. Investigators did not identify any messages in which Zarzar and Vela discussed, for example, positive test rates, the qualifications of the personnel employed by the program, the safety of the personnel performing the tests, or quality control measures.

44. Thus, Vela likely paid Zarzar kickbacks while Zarzar served as the laboratory director for TLC #2's testing but performed none of the duties he was obligated to perform under the CLIA program.

Cash Withdrawal and Deposit Activity

45. Investigators conducted a detailed analysis of bank activity in Zarzar's personal and business bank accounts from 2018 to 2024. In addition to the payments via check, Zarzar made a significant number of cash deposits which were unexplained by his known medical practice. During the time period, Zarzar deposited more than \$1.71 million in cash. For context, in the same period Zarzar received approximately \$2.39 million in electronic deposits and checks constituting

reimbursements from all Medicaid payors. Thus, Zarzar received nearly as much in cash as he did from his billing payments from his medical practice during this six-year period.

46. The cash deposits are far more than could be explained by cash payments from clinic patients. Employees recalled that, because most of Zarzar's patients were Medicaid recipients, very few patients were required to pay a copay for an office visit or other services received at the clinic. For the fraction of patients who were required to make a copay at the clinic, the parent or guardian usually paid with a credit or debit card. Cash payments were rare, and at the end of a typical day, the cash box in the reception area often contained less than \$200, and in many instances less than \$50.

47. Zarzar utilized a Clover point-of-sale device to accept card payments and generate receipts. Whenever employees accepted a cash copay, they also entered the amount into the Clover device to generate a receipt, even though no electronic transaction occurred.

48. Investigators reviewed records obtained from Fiserv, Inc., the parent company of Clover, relating to Zarzar's Clover device from 2018 to 2023. The records showed that the Clover device was used to track cash payments beginning in mid-2022. In the second half of 2022, the clinic took in approximately \$1,810 in cash payments. In all of 2023, the clinic took in approximately \$3,410 in cash per records reviewed by investigators.

49. In addition to the cash deposits, investigators observed that during the same time period, Zarzar purchased and sold a large number of rare and collectible coins and banknotes, paying as much as tens of thousands of dollars for some of the items. Zarzar also purchased other collectible items such as vintage posters and military regalia. Zarzar conducted most of his purchases on several online auction platforms, including Heritage Auctions, Stack's Bowers Galleries, and Great Collections. During the period, Zarzar spent more than \$1.79 million on

collectibles from his personal and clinic bank accounts, while the same accounts only received approximately \$1.13 million from the sale of such items. Investigators were able to review Zarzar's sales of collectibles from records of electronic transfers sent to Zarzar found in records from banks and auction companies.

50. Based on records reviewed by investigators, during the relevant time period, Zarzar made 14 cash deposits over \$10,000 totaling approximately \$356,000. Twelve of these deposits were made into Zarzar's personal bank accounts, while the other two were made into an account belonging to Princess Mili Investments, a business registered to Zarzar. Given the volume of transactions and records reviewed by investigators, the sale of coins and collectibles likely does not account for the cash deposits observed by investigators.

51. On at least one occasion, Zarzar made a cash deposit close in time to repeated communications with Vela during the operation of the kickback scheme. On or about October 22, 2022, call records reviewed by investigators showed that Zarzar and Vela had phone contact multiple times. Vela also had phone contact multiple times with one of Vela's employees on that date as well. Within hours of these phone contacts, Zarzar deposited \$4,000 in his Texas Regional Bank account ending x0037 (Texas Regional Account 1). Zarzar had previously made two prior cash deposits totaling \$4,500 on October 21, 2022.

52. Investigator review of bank records for accounts controlled by or associated with Vela, as well as review of text messages from Vela's mobile device indicated that Vela deals extensively in cash. On numerous occasions, TLC #2 employees informed Vela that they had left envelopes of cash in his personal office at the pharmacy, with the envelopes containing the cash at times having handwritten notes showing how much cash was contained, often in the thousands of dollars. Investigator review showed that this practice was used by Vela regularly during the

timeframe of the kickback scheme. For instance, investigator review found that on June 6, 2023, a TLC #2 employee sent Vela a photograph via text message of an envelope bearing the Lone Star National Bank logo with the words “Boss 2000” handwritten on the envelope. In another instance, Vela issued at least four checks to a TLC #2 employee all dated July 16, 2023, totaling more than \$10,000 and drawn on two different pharmacy bank accounts. Bank records and images of the four checks suggest that the TLC #2 employee cashed the checks. In text messages on July 16, 2023, the TLC #2 employee told Vela that \$4,500 was left for Vela.

53. Investigators also reviewed Zarzar’s tax records. For tax year 2019, Zarzar reported \$672,731 in gross receipts/sales for his two businesses (Francisco J. Zarzar M. D. P. A. and Princess Mili Investments) combined. In the same year, he deposited approximately \$219,508 in cash. Investigator review of Zarzar’s business income showed that the vast majority of the revenue generated by the clinic was paid by insurance providers (including Medicaid) to Zarzar via electronic transfer and other electronic means. In addition, employees of the Clinic indicated that the cash income of the business was limited, which was corroborated by investigators through financial records as detailed above. Thus, it is unlikely that the cash deposited by Zarzar in 2019 is included in the receipts/sales that he reported for his clinic and was therefore likely not reported by Zarzar.

54. For tax year 2020, Zarzar reported \$553,275 in revenue for his two businesses combined. In the same year, he deposited more cash than the total revenue he reported on his tax returns, approximately \$555,643. This disparity indicates that it is likely not possible that Zarzar reported all cash income received as gross receipts/sales. Again, most payments made to Zarzar for services billed at the Clinic were transferred electronically from insurance providers and Medicaid. Thus, the cash he received and deposited in 2020 likely represent funds not derived

from declared revenue, and are hundreds of thousands of dollars greater than his reported gross receipts/sales for both businesses in 2020.

55. For tax year 2021, Zarzar reported \$478,400 in revenue for his two businesses combined. In the same year, he deposited approximately \$351,036 in cash. More than 85% of the gross receipts/sales he reported were generated by his clinic, which was generally paid by insurance companies via electronic payments, not in cash. The cash Zarzar received and deposited in 2021 likely consisted of proceeds not derived from declared revenue.

56. Finally, for tax year 2022, Zarzar reported \$363,534 in revenue for his clinic. He deposited \$351,013 in cash during the same year. Since most insurance payments to Zarzar were paid by insurance companies via electronic payments, the reported revenue likely does not include the cash received by Zarzar. The amount of cash deposited by Zarzar is also inconsistent with the payment processing records described above showing that the clinic took in less than \$2,000 in cash during the last six months of 2022.

57. Based on the above information discovered by investigators, Vela likely attempted to disguise significant cash withdrawals, Zarzar received cash from Vela, and Zarzar likely failed to report his cash proceeds, all while the kickback scheme was ongoing. The investigation also uncovered no known legitimate source for Zarzar's cash deposits. When taken together, it appears that Zarzar received additional illicit funds in cash during the scheme.

THE OVERBILLING SCHEME

58. Beginning in or about 2018, Zarzar engaged in a scheme whereby he would often bill Medicaid for services not justified by the duration and level of care he provided patients at the Clinic. Specifically, Zarzar billed Medicaid for services not justified based on the time spent with patients and detail of the care provided, according to statements provided to and records reviewed

by investigators. Zarzar's fraudulent billing practices constituted a significant portion of the Clinic's revenue, generated significant illicit proceeds, and were pervasive to the point that the billing fraud scheme comprised a substantial portion of the Clinic's operations.

Zarzar's Office Visit Claims Are Not Supported by Employee Statements or Records

59. Based on employees' statements and analysis of Medicaid claims data, Zarzar engaged in a health insurance fraud scheme often known as upcoding, allowing him to bill for (or cause to be billed for) services not rendered in violation of 18 U.S.C. § 1347.

60. Outpatient office visits, such as those which occur between the patient and physician in the clinic setting, may be billed using either the amount of face-to-face time the physician spends with the patient or the level of complexity of decision-making required of the physician during the visit. For example, according to the American Medical Association, the CPT code 99212 corresponds to an established patient office visit of between 10 and 19 minutes or a visit which requires "straightforward" decision-making³. The CPT code 99213 corresponds to an established patient office visit of between 20 and 29 minutes or a visit which requires a "low level" of decision-making⁴. The CPT code 99214 corresponds to an established patient office visit of between 30 and 39 minutes or a visit which requires a "moderate level" of decision-making⁵.

61. According to employees, Zarzar typically closed the clinic for at least one hour, and often two to three hours, around midday. Additionally, employees of the Clinic informed investigators that Zarzar frequently closes the Clinic in the early afternoon and instructs the Clinic staff to reschedule any waiting patients. Beginning in or about April 2024, Zarzar ceased treating

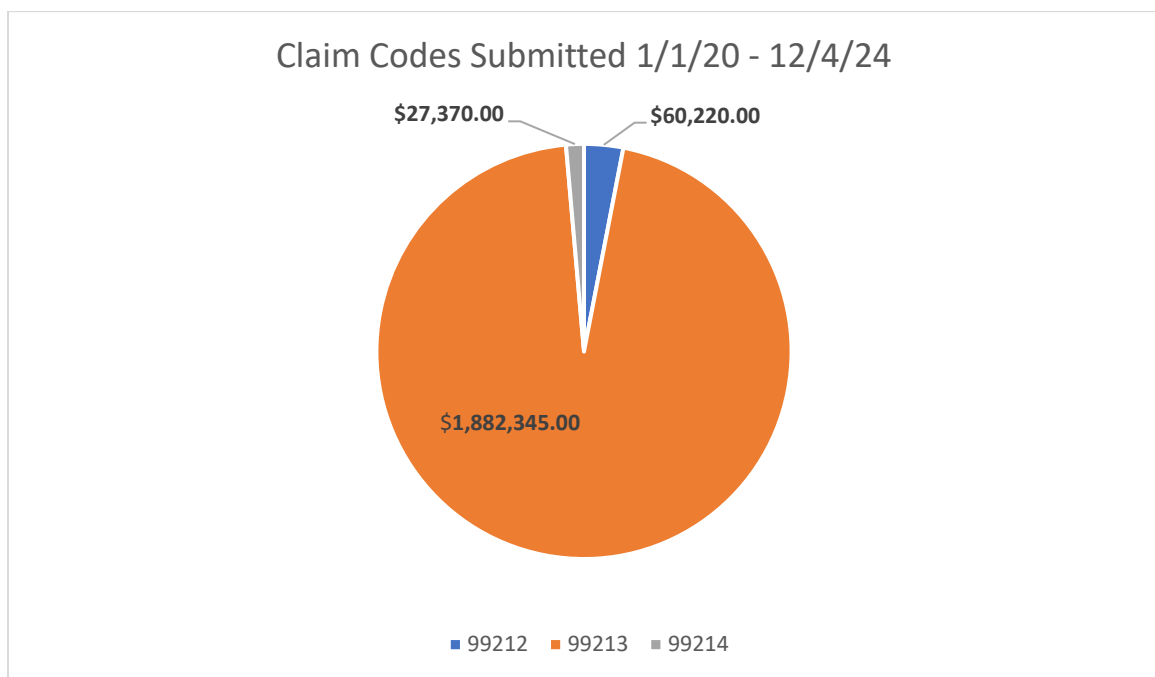
³ <https://www.ama-assn.org/practice-management/cpt/cpt-code-99212-established-patient-office-visit-10-19-minutes>

⁴ <https://www.ama-assn.org/practice-management/cpt/cpt-code-99213-established-patient-office-visit-20-29-minutes>

⁵ <https://www.ama-assn.org/practice-management/cpt/cpt-code-99214-established-patient-office-visit-30-39-minutes>

patients at the Clinic on Fridays and instead worked at another physician's clinic in Rio Grande City, Texas, and Roma, Texas, on Fridays.

62. According to analysis of billing claims for the period of 1/1/2020 to 12/04/2024, Zarzar submitted (or caused to be submitted) 14,353 billing claims for \$1,882,345.00 using the CPT code 99213. By comparison, in the same period, he submitted (or caused to be submitted) 604 billing claims for \$60,220.00 using the CPT code 99212 and 165 billing claims for \$27,370.00 using the CPT code 99214.



63. While investigator review of billing data showed that Zarzar billed for established patient office visits using CPT code 99213, employees stated that Zarzar's office visits were cursory, meaning that they often failed to meet time and decision-making complexity to properly bill for services using this code at such a high frequency. Employees of the Clinic generally agreed that Zarzar often spent no more than 10 to 15 minutes with a single patient. In fact, according to one employee, Zarzar would spend less than five minutes with each patient and would only perform a cursory check of the patient's ears and throat, ask the patient's caretaker how the patient

is feeling, and refer the patient to a specialist if necessary. Employees also stated that Zarzar did not enter the exam room at all for certain patients, but rather sent non-physician employees into the exam room to perform a specific check or obtain a specific piece of information and then report back to Zarzar.

64. In addition to employee statements, the number of office visits for which Zarzar submitted claims on particular days contradicts the stated duration and complexity of the claims. Investigators reviewed the record for date of service Monday, September 26, 2022, where Zarzar submitted 45 claims using CPT code 99213, in addition to other services rendered on the same day. A conservative calculation, if each office visit lasted 15 minutes, yields 11 hours and 15 minutes of face-to-face time spent by Zarzar with patients billed with code 99213 on that day.

65. Investigators reviewed additional dates as well, including date of service Wednesday, August 18, 2021, where Zarzar submitted 38 claims for office visits using the 99213 code, in addition to other services rendered on the same day. Assuming a 15-minute office visit with each patient, Zarzar would have needed to spend 9 hours and 30 minutes of face-to-face time with patients billed with code 99213 on that day.

66. Investigators also reviewed date of service Monday, October 3, 2022, where Zarzar submitted 47 claims for 99213 office visits, in addition to other services on the same day. Once again assuming 15 minutes of face-to-face time with each patient, Zarzar would have spent 11 hours and 45 minutes with patients. Date of service Monday, October 16, 2023, was also reviewed, where Zarzar submitted 33 claims for 99213 office visits, in addition to other services on the same day. If Zarzar had spent 15 minutes of face-to-face time with each patient, he would have spent 8 hours and 15 minutes with patients billed with code 99213 on that day.

67. In each of these examples, investigators estimate that the time Zarzar would have been required to spend examining patients exceeded the Clinic's stated operating hours of 10:00 AM to 5:00 PM. As detailed previously, employees of the Clinic stated that the Clinic was regularly closed during lunch and was at times closed in the afternoons. Based on this information, it is likely that Zarzar regularly submitted claims using code 99213 to Medicaid that were not justified by an adequate duration or complexity of care.

68. Investigators also reviewed partial patient files containing progress notes and laboratory test results for 27 patients which were seized from Zarzar's clinic pursuant to a federal search warrant in June 2024. All 27 patients were Medicaid beneficiaries for whom Zarzar submitted claims using the 99213 billing code between 2020 and 2024. Zarzar kept patient records on paper and appears to have used the same progress note template for every office visit.

69. Investigators noted that the progress notes were deficient in several respects. First, the section of the note corresponding to the physical examination of the patient's body and major systems was left blank on most notes. In fact, for one patient (P 1), none of the 58 progress notes in the patient's file contained any record of a physical examination. For example, on June 28, 2021, Zarzar diagnosed P 1 with constipation, among other conditions, and prescribed a laxative medication but failed to record any examination of the patient's abdomen in the section specifically labeled "Abdomen." Similarly, on May 14, 2024, Zarzar diagnosed P 1 with a cough and upper respiratory infection, among other conditions, but failed to record any examination of the patient's lungs or chest in the sections specifically labeled "Lung" and "Chest."

70. The progress notes found in P 1's file are one example of deficient record keeping by Zarzar. This pattern of nonexistent or insufficient documentation of physical examinations was observed by investigators across the files of all 27 patients whose records were reviewed.

71. Second, investigator review showed that the assessment and treatment plan sections of the progress notes were generally simplistic and insufficient to justify the associated billing codes. In most cases, the assessment consisted solely of the diagnosis or diagnoses (e.g. fever, allergic rhinitis, upper respiratory infection, cough, etc.). On rare occasions, laboratory test results, such as those from a Complete Blood Count (CBC), were noted in this section. The treatment plan consisted solely of the medications to be prescribed to the patient. No discussion between Zarzar and the patient or the patient's parent or guardian regarding the treatment plan was recorded in any of the progress notes reviewed by investigators.

72. Third, most progress notes were not signed by Zarzar. For medical documentation to be considered valid, investigators determined that Medicaid requires the rendering physician to sign the medical documentation which supports the claim for reimbursement submitted to Medicaid. Medicaid does not require that the physician submit the documentation together with the billing claim; rather, the physician agrees to retain the documentation for a prescribed number of years and must produce it upon request.

73. Many of the patient files contained at least one progress note from a physician other than Zarzar. For example, P 1's file contained documentation from an appointment with a dermatologist, an overnight hospital stay, and an X-ray performed by a radiologist. All three encounters were described in detail and electronically signed by the rendering provider, which was not Zarzar. Zarzar's own notes generally contained no such documentation or signatures.

74. Based on the Clinic's stated hours of operation, employee statements about Zarzar's work hours, and investigator review of Zarzar's medical and billing records, the evidence shows that Zarzar often used the 99213 code to bill for services where he failed to provide care of a duration and complexity justified by the 99213 code in violation of 18 U.S.C. § 1347. Based on

these discrepancies, Zarzar's fraudulent billing practices were pervasive and generated significant illicit proceeds.

ASSET ANALYSIS

75. Zarzar used proceeds of the above-described fraudulent activity to acquire the items listed in Attachment A. Based on investigator financial analysis and tracing, Zarzar used kickback proceeds to acquire certain representative items listed in Attachment A. In addition, investigator review of Zarzar's billing Medicaid practices produced substantial fraud proceeds due to the above-described overbilling. Proceeds from this overbilling constituted a significant portion of Zarzar's income during the scheme, which he also used to fund purchases of the seized items listed in Attachment A. Investigator review of Zarzar's financial records found consistent payments from Zarzar to providers of collectibles, coins, and historical paraphernalia throughout the course of the above-described scheme. Review of additional records is ongoing.

76. Investigators executed a search warrant at the Clinic on June 28, 2024, and seized certain property as authorized by the warrant, including the items listed in Attachment A. Under this authority, investigators seized approximately 227 coin items, approximately 72 banknote items, 51 Pokemon card items, 42 posters and historical documents, and three pieces of military memorabilia.⁶ Investigators reviewed records from online auction companies where Zarzar purchased many of the seized coin items, as well as records stickers on the coins' plastic capsules, which indicated the auction company, auction number and lot number. To date, investigators have identified 55 coin items which Zarzar purchased between 2018 to 2024, with additional review ongoing.

⁶ In the case of the coins, banknotes, and Pokemon cards, the vast majority of the items were seized as individual items; however, for the purpose of these totals, in cases where multiple coin/notes/cards were contained within a single frame or holding case, they have been counted as a single item, and are listed as such in the detail list.

77. The analysis below demonstrates how Zarzar used proceeds of the above-described fraudulent activity to acquire representative items from these categories. Based on this financial analysis and tracing, Zarzar likely used kickback proceeds to acquire the seized items listed in Attachment A. Review of additional records is ongoing.

Coins

78. On October 13, 2020, Zarzar deposited check #17725 signed by Vela in the amount of \$1,330 from Moron Vela Inc. into his Frost Bank account ending x4663 (Frost Account 1), his personal bank account. On the same day, Frost Account 1 debited \$1,552.94 to Heritage Auctions. According to records provided by Heritage, the funds were applied as a partial payment toward a 1724-M João V 20000 Reis gold coin which Zarzar had purchased in April 2020. This coin was not found by investigators during the June 2024 search warrant at the Clinic. Check #17725 from Vela constituted illicit funds which were comingled with the existing funds in Frost Account 1.

79. On October 20, 2020, Zarzar deposited \$4,500 cash into his Frost Account 1. On October 21, 2020, Frost Account 1 debited \$3,571.91 to Heritage Auctions. According to records provided by Heritage, the funds were applied as a partial payment toward an 1857-S \$20 Spiked Shield, Variety 20A coin and a 1908-D \$20 No Motto coin which Zarzar had purchased on August 03, 2020, for a combined \$44,007.57. These coins were not found by investigators during the June 2024 search warrant at the Clinic.

80. On November 17, 2020, Zarzar deposited check #17786 signed by Vela in the amount of \$1,340 from Moron Vela Inc. into his Frost Account 1. On November 18, 2020, Frost Account 1 debited \$2,261.13 to Great Collections. According to records provided by Great Collections, the funds were applied as a partial payment toward a 1988 \$10 Quarter-Ounce Gold American Eagle coin and a 1992 \$50 One-Ounce Gold American Eagle coin which Zarzar had

purchased at auction on November 15, 2020, for a combined \$9,137.98. These coins were not found by investigators during the June 2024 search warrant at the Clinic. Check #17786 from Vela constituted illicit funds which were comingled with the existing funds in Frost Account 1.

81. On March 21, 2022, Zarzar conducted a cash deposit in the amount of \$5,000 into Frost Account 1. On March 22, 2022, Zarzar conducted four additional cash deposits: one in the amount of \$538.79, one in the amount of \$500, one in the amount of \$2,000, and one in the amount of \$7,500. Also, on March 22, 2022, Frost Account 1 debited \$5.890.22 to Heritage Auctions. According to records provided by Heritage, the funds were applied to the purchase of five coins which had been purchased by Zarzar on March 20, 2022: a 100 Francs Federico Fellini gold coin, a 100 Francs Romy Schneider gold coin, a 50 Pence “Public Library” gold coin, a 50 Pence Roger Bannister gold coin, and a 50 Pence Girl Guides gold coin. All five coins were seized by investigators during the June 2024 search warrant at Zarzar’s clinic.

82. Investigators recovered a total of 227 collectors coin items from the Clinic during the search warrant in June of 2024 (as listed in Attachment A).

Bank Notes

83. On February 08, 2021, Zarzar deposited check #19259 signed by Vela in the amount of \$1,555 from Moron Vela Inc. into Frost Account 1. Two days later, on February 10, 2021, Frost Account 1 debited \$1,585.31 to Heritage Auctions. According to records provided by Heritage, the payment was applied toward the purchase of a 1990 \$20 United States banknote which Zarzar had purchased in January 2021. This item was seized from Zarzar’s clinic. The funds from check #19259 from Vela constituted illicit funds which were comingled with the existing funds in Frost Account 1.

84. On June 27, 2023, Zarzar deposited check #9126 signed by Vela in the amount of \$10,000 from Paloma's Pharmacy dba Apple Pharmacy #3 into his Lone Star National Bank account ending x2636 (Lone Star Account 1), an account related to the Clinic. On the same day, Zarzar also deposited check #1432 signed by Vela in the amount of \$10,000 from Pro-Script Pharmacy into Lone Star Account 1. These two checks constituting illicit kickbacks from Vela to Zarzar totaled \$20,000. Approximately 10 days later, on July 7, 2023, Lone Star Account 1 debited \$2,308.91 to Stack's Bowers. According to records provided by Stack's Bowers Galleries, the funds were applied as a partial payment toward a 1936 Costa Rica banknote which Zarzar had purchased at auction in May 2023 for \$13,680. This banknote was seized by investigators during the June 2024 search warrant at the Clinic. Without the illicit proceeds from Vela, the existing funds in Lone Star Account 1 would not have been sufficient to fund Zarzar's payment to Stack's Bowers.

85. On July 3, 2023, Zarzar deposited check #48670 signed by Vela in the amount of \$3,000 from Simcha Inc. dba Mi Jardin Adult Daycare into his Texas Regional Bank account ending x0037 (Texas Regional Account 1), an account related to the Clinic. Later the same day, Texas Regional Account 1 debited \$2,000 via PayPal to Stack's Bowers Galleries. The payment was applied to the same 1936 Costa Rica banknote described above. Check #48670 from Vela constituted illicit funds which were comingled with the existing funds in Texas Regional Account 1.

Military Memorabilia

86. On June 27, 2023, Zarzar deposited check #9126 signed by Vela in the amount of \$10,000 from Paloma's Pharmacy dba Apple Pharmacy #3 into Lone Star Account 1. On the same day, Zarzar also deposited check #1432 signed by Vela in the amount of \$10,000 from Pro-Script

Pharmacy into Lone Star Account 1. Approximately 10 days later, on July 7, 2023, Lone Star Account 1 debited \$2,382.50 to Valkyrie Outlet. According to a query of open-source records, Valkyrie Outlet hosts auctions of World War II memorabilia, specializing in German military items such as daggers and swords, insignia, medals, uniforms, and helmets. Investigators seized a WWII German army officer's uniform and hat from Zarzar's clinic. Without the illicit proceeds from Vela, the existing funds in Lone Star Account 1 would not have been sufficient to fund the payment to Valkyrie Outlet.

Artwork, Posters, and Historic Documents

87. On November 23, 2020, Zarzar deposited check #17797 signed by Vela in the amount of \$1,645 from Moron Vela, Inc., into his Frost Account 1. Later the same day, Frost Account 1 debited \$1,115.03 to Heritage Auctions. According to records provided by Heritage, the payment was applied toward a set of four Lalique clear and frosted table articles and a Lalique frosted glass *Chat Assis* figure. These items were not found by investigators during the June 2024 search warrant at the Clinic. Without the illicit proceeds from Vela, the existing funds in Frost Account 1 would not have been sufficient to fund the payment to Heritage.

88. On February 08, 2021, Zarzar deposited check #19259 signed by Vela in the amount of \$1,555 from Moron Vela Inc. into Frost Account 1. Two days later, on February 10, 2021, Frost Account 1 debited \$1,521.86 to Heritage Auctions. According to records provided by Heritage, the payment was applied toward the purchase of a Marilyn Monroe print which Zarzar had purchased in January 2021. This item was seized from Zarzar's clinic. The funds from check #19259 from Vela constituted illicit funds which were comingled with the existing funds in Frost Account 1.

89. On May 29, 2021, Moron Vela Inc. issued check #19390 payable to Frank Zarzar in the amount of \$215. The check was signed by Vela. The check was endorsed with a signature which was consistent with examples of Zarzar's signature known to investigators. The endorsement also referenced Frost Account 1, but the check was not deposited into that account. On June 01, 2021, Zarzar conducted a cash deposit into Frost Account 1 in the amount of \$2,800. The next day, on June 2, 2021, Zarzar conducted another cash deposit into Frost Account 1 in the amount of \$7,000. On June 03, 2021, Frost Account 1 debited \$798.55 to Heritage Auctions. According to records provided by Heritage, the payment was applied to the purchase of historic letters signed by Emile Zola and Augustus Saint-Gaudens. Both letters were seized by investigators during the June 2024 search warrant. The funds from check #19390 from Vela constituted illicit funds were likely converted to cash, deposited, and comingled with the existing funds in Frost Account 1.

90. On December 4, 2023, Zarzar deposited check #1024 signed by Vela in the amount of \$6,000 from Apple Scruffs Holdings into Lone Star Account 1. On the same day, Zarzar also conducted a cash deposit of \$2,500 into Lone Star Account 1 and a separate cash deposit of \$1,200 into the same account. Later the same day, Lone Star Account 1 debited \$805 via PayPal to a merchant called "Rare Posters" and debited \$1,474 to SQ Poster Auctions. Investigators seized multiple posters from Zarzar's clinic during the June 2024 search warrant. Check #1024 from Vela constituted illicit funds which were comingled with the funds in Lone Star Account 1.

91. On June 11, 2024, Lone Star Account 1 received an electronic funds transfer (EFT) from Driscoll (a Medicaid managed care organization, or MCO) in the amount of \$496.88. On June 12, 2024, Lone Star Account 1 received an EFT from Centene (another Medicaid MCO) in the amount of \$580.76 and an EFT from Blue Cross Blue Shield (another Medicaid MCO) in the

amount of \$562.77. The total of the three EFTs was \$1,640.41. On June 13, 2024, Lone Star Account 1 debited \$1,770.41 to Heritage Auctions. On June 14, 2024, the account debited an additional \$3,000 to Heritage. Both debits were applied as partial payments toward a lot of 15 vintage posters and prints which Zarzar purchased from Heritage in June 2024 for a combined \$4,770.41. All 15 posters and prints were seized from Zarzar's clinic. The three EFTs were likely illicit funds from overbilling which were comingled with the existing funds in Lone Star Account

Pokemon Cards

92. On November 5, 2022, Moron Vela Inc. issued a check payable to Frank Zarzar in the amount of \$1,000. The check was signed by Vela. The check was endorsed with a signature which was consistent with examples of Zarzar's signature known to investigators, but no bank account information was included in the endorsement. Investigators were unable to determine where the check was cashed or deposited. On November 10, 2022, Zarzar conducted a \$2,000 cash deposit into Texas Regional Account 1. Also, on November 10, 2022, Texas Regional Account 1 debited five transactions to eBay, Inc. totaling \$999.70. Investigators reviewed records provided by eBay and observed that a user account associated with Zarzar purchased five Pokemon cards on November 9, 2022, and November 10, 2022: four Giratina Lost Origin cards professionally graded in PSA 10 condition and one Arezu Lost Origin card also professionally graded in PSA 10 condition. All five cards (or identical versions of the cards, since Zarzar owned multiple duplicates of the same cards) were seized from Zarzar's clinic.

SEIZED ITEMS SUBJECT TO FORFEITURE

93. Zarzar used proceeds of the above-described fraudulent activity to acquire the items listed in Attachment A. Based on investigator financial analysis and tracing, Zarzar used kickback proceeds to acquire the representative items as outlined above. Investigator review of Zarzar's

Medicaid billing practices also showed substantial fraud proceeds due to the Zarzar's overbilling of Medicaid. Proceeds from this overbilling constituted a significant portion of Zarzar's income during the scheme, which he also used to fund purchases of the seized items in Attachment A.

CONCLUSION

94. The Defendant Properties as listed in Attachment A are subject to forfeiture under 18 USC § 981(a)(1)(C) and 18 USC § 981(a)(1)(A). The Defendant Properties as listed in Attachment A were properties involved in, traceable to, and constitutes proceeds of, violations of 42 U.S.C. § 1320a-7b, 18 U.S.C. § 1347, 18 USC § 1956(a)(1)(B)(ii), 18 USC § 1956(a)(1)(A)(i), and 18 U.S.C. § 1957.

NOTICE TO ANY POTENTIAL CLAIMANT

YOU ARE HEREBY NOTIFIED if you assert an interest in the Defendant Properties subject to forfeiture and want to contest the forfeiture, you must file a verified claim which fulfills the requirements set forth in Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. The verified claim must be filed no later than thirty-five (35) days from the date this complaint was sent to you in accordance with Rule G(4)(b); or, if this Complaint was not sent to you, no later than 60 days after the first day of publication of notice on an official internet government forfeiture site, in accordance with Rule G(5)(a)(ii)(B).

An answer or a motion under Federal Rule of Civil Procedure 12 must be filed no later than twenty-one (21) days after filing the claim. The claim and answer must be filed with the United States District Clerk for the Southern District of Texas, either electronically or at the United States Courthouse, 515 Rusk Avenue, Houston, Texas 77002. A copy must be served upon the undersigned Assistant United States Attorney either electronically or at the address provided in this Complaint.

RELIEF REQUESTED

The United States will serve notice, along with a copy of the Complaint, on the property owner and on any other persons who reasonably appear to be potential claimants. The United States seeks a final judgment forfeiting the Defendant Properties to the United States and any other relief to which the United States may be entitled.

Respectfully submitted,

ALAMDAR S. HAMDANI
United States Attorney
Southern District of Texas

BY: /s/ Theodore V. Parran, III
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VERIFICATION

I, Steven Alcorn, a Special Agent employed by the Federal Bureau of Investigation, declare under the penalty of perjury, as provided by 28 U.S.C. § 1746, that I have read the foregoing Verified Complaint for Civil Forfeiture In Rem and Notice to Potential Claimants, and that the facts stated in paragraphs 7-93 are based upon my personal knowledge, upon information obtained from other law enforcement personnel, and upon information I obtained in the course of my investigation, and they are true and correct to the best of my knowledge and belief.

Executed on the 12th day of December, 2024.



Steven Alcorn, Special Agent
U. S. Federal Bureau of Investigation

ATTACHMENT A

DETAIL LIST OF SEIZED ITEMS SUBJECT TO FORFEITURE

Coins

- Item 1 - 1964 Israel G50L, Bank of Israel, PF67, S/N: 4244239-001
- Item 2 - EE1972 (1979) Ethiopia G400B, Year of the Child, PF70 Ultra Cameo, S/N: 4430861-080
- Item 3 - 50 Years of the SOP; 2019 G. Britain G50P, Roger Bannister, PF70 Ultra Cameo, S/N: 48666536-039
- Item 4 - 2008 Medal PCGS PR 70DCAM, Saudi Arabia, 75th Ann. Aramco Au 8g, S/N: 628055.70/84121716
- Item 5 - 1970-71 Burma 2MU, Patriotic Liberation Army, MS68, S/N: 5702981-013
- Item 6 - 1989 Cuba G100P, French Revolution 200th Anniv. - Liberty, MS70, S/N: 5703465-034
- Item 7 - AHi 409//1989 Egypt GSI00; The Golden Cat; PF67 Ultra Cameo, S/N: 4672572-007
- Item 8 - 1718-A, L.D'Or PCGS MS62, France, S/N: 620028.62/3418884 7
- Item 9 - 1988 Mauritius 500R, MS 67, S/N: 4730068-006
- Item 10 - 1986 Fiji 0\$200, Figi Snake, PF 70 Ultra Cameo, S/N: 2737148-009
- Item 11 - 1987 Gold S. Leone Leone Freetown Bicentennial, PF 70 Ultra Cameo, S/N: 4249951-002
- Item 12 - 1975 Senegal G500F; Eurafrique Program; MS70, S/N: 4688412-060
- Item 13 - 1975 Piefort France IOC; KM-P250 Gold, PF 64 Ultra Cameo, S/N: 3067381-002
- Item 14 - 1988 Cayman IS G\$250, Princess Alexandra Visit, PF 69 Ultra Cameo, S/N: 2753448-002
- Item 15 - 1975 Pound PCGS MS 65 Uganda, S/N: 919994.65/5667334
- Item 16 - 1997 France G100F, World Cup -Africa, PF 70 Ultra Cameo, S/N: 3356544-083
- Item 17 - 2000 Gold France G655.9F, Art Nouveau, PF 70 Ultra Cameo, S/N: 2869448-004
- Item 18 - 1978 Piefort France IOC, KM-P601 Gold, PF 67 Ultra Cameo, S/N: 3718760-042
- Item 19 - 2002 France G20L, 1st Transatlantic Flight 75 Anniversary, PF 70 Ultra Cameo, S/N: 4746145-016
- Item 20 - 1998 G. Britain G50P, E.E.C. Anniversary, PF 70 Ultra Cameo, S/N: 4882366-004
- Item 21 - 1978 Piefort France G10F, PF67, S/N: 2806159-001
- Item 22 - 1990MW Poland G200KZ, Solidarity Anniversary 39mm, PF 65 Ultra Cameo, S/N: 4425970-009
- Item 23 - 1998 G. Britain 2 Sov, PF 70 Ultra Cameo, S/N: 46558673-003
- Item 24 - 1983FM Romania IO00L, PF66 Ultra Cameo 0017/1000, S/N: 2801943-002
- Item 25 - Treasures of Paris, 2017 France G200E, Statute of Liberty, PF 70 Ultra Cameo, S/N: 2814682-007
- Item 26 - 1982 St. Kitts G\$100, Siege of Brimstone Hill, PF 70 Ultra Cameo, S/N: 4575062-005
- Item 27 - 2000 France G 1 00F, Louis IX ECU, S/N: 2869082-004
- Item 28 - 2000 Gold France G655.9F, Classic & Baroque, PF 70 Ultra Cameo, S/N: 2869448-00
- Item 29 - 1992 G. Britain 2 Sov, PF 70 Ultra Cameo, S/N: 4930408-016
- Item 30 - 1978 Piefort France IC, KM-P595 Gold, PF 67 Ultra Cameo, S/N: 3701423-005
- Item 31 - 50 Years of the 50P, 2019 G. Britain G50P Girl Guides, PF 70 Ultra Cameo, S/N: 5774849-016
- Item 32 - 1981 Piefort France 2F, KM-P705 Gold, PF67, S/N: 1729767-018
- Item 33 - 1971 Essai Luxembourg 5F Gold, PF 64, S/N: 4883367-007

Item 34 - 2011 G. Britain GL25, Britannia, PF 70 Ultra Cameo, S/N: 2712658-014
Item 35 - 1718 France IL'OR, AU 50, S/N: 4630966-001
Item 36 - 1991 G. Britain 2 Sov., PF 70 Ultra Cameo, S/N: 4663980-021
Item 37 - 1964 Israel G50L, Bank of Israel, PF 69, S/N: 28399906-002
Item 38 - Historical Currencies, 2014 France G50E, Charles the Bald Denier, PF 70 Ultra Cameo, S/N: 2712658-016
Item 39 - 2000 France GI00F, 20th Century Physical Sciences, PF 69 Ultra Cameo, S/N: 6212585-004
Item 40 - 1984 France G 1 00F, Marie Curie, PF 70 Ultra Cameo, S/N: 4925304-006
Item 41 - 1978 Piefort France 1/2F, KM-P607 Gold, PF67, S/N: 3597060-001
Item 42 - 1894A France 50C, MS 66, S/N: 4214534-013
Item 43 - AH 1076/8 India Mohur, Mughal Empire, Aurangzeb Alamgir, MS 66, S/N: 5711838-007
Item 44 - 1990 G. Britain 2 Sov., PF 70 Ultra Cameo, S/N: 4679320-044
Item 45 - 1971 Dahome G2500F Dancers, PF 69 Ultra Cameo, S/N: 2733604-007
Item 46 - 1995 France GI00F Romy Schneider, PF 69 Ultra Cameo, S/N: 6281219-004
Item 47 - 2013 France G50E, Pessac Industrial Site 40th Anniversary, PF 70 Ultra Cameo, S/N: 2712658-017
Item 48 - 1996 France G75E, St. Stephens Cathedral, PF 70 Ultra Cameo, S/N: 4667818-009
Item 49 - 1997 Oman GIR, 27th National Day, PF 70 Ultra Cameo, S/N: 4580751-011
Item 50 - 1993 Cuba G200P, KM-P56 Piefort, PF 67 Ultra Cameo, S/N: 3159102-017
Item 51 - PCGS PR69DCAM, Thailand Conservation, S/N: 186545.69/28581541
Item 52 - 1987 Piefort France 10F, KM-P987 Platinum, PF 69 Ultra Cameo, S/N: 2024900-008
Item 53 - Thracian or Scythian Coson, after 54 BC, AV Stater (8.59g), obv procession, monogram, rv, S/N: 4277028-004
Item 54 - 1998 France GI00F, Nile - King Tutankhamon, PF 70 Ultra Cameo, S/N: 4580780-005
Item 55 - 1995 France G100F, Federico Fellini, PF 69 Ultra Cameo, S/N: 3602234-020
Item 56 - 2017 G. Britain GL2, Wedgwood 260th Anniversary, PF 70 Ultra Cameo, S/N: 2844933-002
Item 57 - 2000 France GI00F, 20th Century Biology and Medicine, PF 70 Ultra Cameo, S/N: 2824076-002
Item 58 - 2020 G. Britain GL2, VE day, PF 70 Ultra Cameo, S/N: 5880627-006
Item 59 - 1868(68) Spain G 1 OE Madrid, MS 64, S/N: 2650967-007
Item 60 - 50 Years of the SOP, 2019 Piefort, G. Britain GS0P, Britannia New Pence, PF 70 Ultra Cameo, S/N: 2839907-001
Item 61 - 1983FM Romania GI000L, PF 69 Ultra Cameo, 0165/1000, S/N: 4496416-062
Item 62 - 2001 Israel G 1 0NS, Independence & Education, PF 70 Ultra Cameo, S/N: 3736372-053
Item 63 - AH1401/1981 Jordan G60D, Year of the Child, PF 70 Ultra Cameo, S/N: 4714250-012
Item 64 - 2001 PCGS {R70DCAM France, Last year of Franc, S/N: 351916.70/32993524
Item 65 - 1991 PCGS PR69DCAM Kuwait, Liberation of Kuwait X#16, S/N: 695222.69/37463291
Item 66 - 1989 France G500F, Albertville Olympics, Alpine Skiing, PF 70 Ultra Cameo, S/N: 3893568-066
Item 67 - 1978 Piefort France 20C, KM-P604 Gold, PF 68 Ultra Cameo, S/N: 3597065-001
Item 68 - 1979 Peifort France G 1 OF, PF 69 Cameo, S/N: 2810284-016

Item 69 - 1986+M Switzerland G 1/4OZ Eternal Pack, MS 67, S/N: 4678245-002
 Item 70 - 1993 Bosnia G, Cross Country Skier, PF 69 Ultra Cameo, S/N: 1523509-030
 Item 71 - 2003 G. Britain 1/2 Sov, PF 70 Ultra Cameo, S/N: 2833314-010
 Item 72 - 1982FM Romania G500L, First Independent State, PF 70 Ultra Cameo, S/N: 4663918-031
 Item 73 - 2002 G. Britain G2PND, Celtic Design, PF 70 Ultra Cameo, S/N: 3717480-006
 Item 74 - 2007 France G20E, The Little Prince and the Fox, PF 69 Ultra Cameo, S/N: 4410930-006
 Item 75 - 2011 R Vatican G50E, Crucifixion of St. Peter Pope Benedict XVI, PF 70 Ultra Cameo, S/N: 3723217-037
 Item 76 - 2015 France G50E Year of the Goat, PF 70 Ultra Cameo, S/N: 2712658-018
 Item 77 - Characters of Literature 2012 France G50E, Edmond Rostand, Cyrano de Bergerac, PF 70 Ultra Cameo, S/N: 2712658-015
 Item 78 - 1723A France IL'OR LL monogram with Palm Branches, MS 63+, S/N: 4241231-006
 Item 79 - 2013 France G50E Elysee Treaty 50th Anniversary, PF 70 Ultra Cameo, S/N: 2810553-015
 Item 80 - 2015 France G50E, Year of the Goat, PF 70 Ultra Cameo, S/N: 2819287-006
 Item 81 - 50 Years of the 50P, 2017 Piefort G. Britain G50P, Girl Guides, PF 69 Ultra Cameo, S/N: 2839907-003
 Item 82 - 1723R Brazil 4000R, MS64+, S/N: 3725378-002
 Item 83 - 2012 G. Britain GL2, PF 70 Ultra Cameo, S/N: 4837558-003
 Item 84 - 1979 Gilt Europa ECU European Economic Community - Bronze, PL 69, S/N: 280490-005
 Item 85 - 2010 France G200E, Taj Mahal, PF 70 Ultra Cameo, S/N: 2761523-001
 Item 86 - 1970-71 Burma 4MU Patriotic Liberation Army MS 68, S/N: 5702981-014
 Item 87 - 1994 Zambia G750K Rights of the Disabled, PF 67 Ultra Cameo, S/N: 4678231-005
 Item 88 - Unesco World Heritage 1998 Slovakia G5000K, Spissky Castle, PF70 Ultra Cameo, S/N: 4331711-017
 Item 89 - 1989 Gold Luxembourg 20F Grand Duchy Anniversary, PF 70 Ultra Cameo, S/N: 2728564-004
 Item 90 - 2000 France G100F, 20th Century Biology & Medicine, PF 70 Ultra Cameo, S/N: 2869082-001
 Item 91 - 1964 Israel G50L, Bank of Israel PF 67, S/N: 4439693-006
 Item 92 - Roman Empire Tiberius AD 14-37. AR Denarius (3.73g) Lugdunum, rv Livia as Pax, S/N: 4884824-016
 Item 93 - 2004 Shawnee National Pt\$1000, Jefferson & Chief, PF 70 Ultra Cameo, S/N: 4500980-009
 Item 94 - 1975 Piefort France IC, KM-P514 Gold, PF 63 Ultra Cameo, S/N: 3067381-001
 Item 95 - 2001 G. Britain, First Transatlantic Radio, PF 70 Ultra Cameo, S/N: 2725675-014
 Item 96 - 1991 Cuba G50P Joanna, New World 500th Anniversary, PF 70 Ultra Cameo, S/N: 2096648-019
 Item 97 - 1993 Israel G 1 0NS, Revolt and Heroism, PF 70 Ultra Cameo, S/N: 3736373-047
 Item 98 - 1977 Piefort France IOC, KM-P574 Gold, PF 67 Ultra Cameo, S/N: 1521268-003
 Item 99 - AH1395//1975 Jordan 5F, Gold Off Metal Strike, PF 68 Ultra Cameo, S/N: 2807544-005
 Item 100 - 1976 1 Fr, PCGS SP65, France, KM-P556, S/N: 112483.65/26288492

Item 101 - 1992 L2, PCGS PR70DCAM, Great Britain, S-SD2 St. George, S/N: 227415.70/37281079

Item 102 - 1998 France G100F, Nile - The Scribe, PF 70 Ultra Cameo, S/N: 4580780-004

Item 103 - Byzantine Empire, Romanus III, AD 1028-1034, Av Hist. Nomisma 4.4 lg, ov Christ std rv Virgin crown, S/N: 3819894-002

Item 104 - 1970-71 Burma 4MU, Patriotic Liberation Army, MS63, S/N: 2733595-010

Item 105 - AH1395//1975 Yemen G25R, Oil Exploration, PF 68 Ultra Cameo, S/N: 4436189-004

Item 106 - 2003 G. Britain GL2, Discovery of DNA, PF 70 Ultra Cameo, S/N: 4488992-018

Item 107 - 1993 France G500F Arc de Triumph, PF Ultra Cameo, S/N: 4431282-046

Item 108 - 2012P Australia S\$1, Year of the Dragon, High Relief, PF 69 Ultra Cameo, S/N: 2822610-004

Item 109 - 1979 Piefort France Franc, Gold, PF68, S/N: 2810284-015

Item 110 - 2000PM S.G.&S.S GL10 Queen Elizbeth II 100th Anniv. of Birth PF70 Ultra Cameo, S/N: 5702975-009

Item 111 - 1993 Cuba G100P Bolivar & Marti, Outlined Horse, PF 69 Ultra Cameo, S/N: 5703465-025

Item 112 - 1988 Albania G100L, Railroad Anniversary, PF 70 Ultra Cameo, S/N: 4580759-007

Item 113 - 2011 G. Britain GL50, Britannia, PF 70 Ultra Cameo, S/N: 2810553-006

Item 114 - 1979 Berium, PCGS PR68DCAM, Bhutan Gold, S/N: 228067.68/37632759

Item 115 - 1987 \$250, PCGS PR69DCAM, Cayman Islands, 40th Wedding Anniversary, S/N: 653536.69/34000373

Item 116 - 1988 Albania G100L, Railroad Anniversary, PF 68 Ultra Cameo, S/N: 2804286-003

Item 117 - AH1395//1975 Jordan IOOF, Gold Off Metal Strike, PF 68 Ultra Cameo, S/N: 2807544-002

Item 118 - 1994 Piefrot Cuba G200P Montecristi Manifesto, PF 69 Ultra Cameo, S/N: 4916941-002

Item 119 - 2004 G. Britain, First Four Minute Mile, PF 70 Ultra Cameo, S/N: 5880611-006

Item 120 - 1985 St. Thomas G100D, Independence Anniversary, PF 69 Ultra Cameo, S/N: 4678244-001

Item 121 - 1981 100 Din PCGS PR69DCAM, Kuwait KM-17, S/N: 418431.69/16603739

Item 122 - 1997 G. Britain Bi-Metallic Celtic Design, PF70 Ultra Cameo, S/N: 5880610-006

Item 123 - 1971 1/2 Fr, PCGS SP68, France, KM-P426 Piefort, S/N: 112411.68/29420527

Item 124 - AH1401//1981 Jordan G60D, Year of the Child, PF 70 Ultra Cameo, S/N: 3832600-004

Item 125 - AH1202//19 India Mohur, Bengal Presidency, Oblique Milling, MS 62, S/N: 5711832-010

Item 126 - 1983FM Romania 500L, Serial Number, PF70 Ultra Cameo, S/N: 4473795-062

Item 127 - 1982 FM Romania G500L First Independent State, PF 69 Ultra Cameo, S/N: 2818303-005

Item 128 - 2002 LI, PCGS PR70DCAM Great Britain, Three Lions Gold, S/N: 536475.70/81826395

Item 129 - 1996 L2, PCGS PR70DCAM, Great Britain, S-SD2 St. George, S/N: 531479.70/37620961

Item 130 - 1977 Piefort France 20C, KM-P577 Gold, PF 66 Ultra Cameo, S/N: 1521268-004

Item 131 - 2017 G. Britain Sir Isaac Newton, 375 Anniversary of Birth, PF 70 Ultra Cameo, S/N: 2822596-001

Item 132 - 2007 G. Britain GL2, Abolition Slave Trade, PF 70 Ultra Cameo, S/N: 5880610-007
Item 133 - 1990 Piefort Cuba G100P, Jose Marti, PF 69 Ultra Cameo, S/N: 4625773-003
Item 134 - 1983 Seychelle, 5th Anniversary of Central Bank, PF 67 Ultra Coin, S/N: 2013056-001
Item 135 - 1997 France G15E Van Gogh Self Portrait, pF 70 Ultra Cameo, S/N: 4580772-025
Item 136 - 1993 50Fr PCGS PR70DCAM, France, Arc de Triomphe-Platine, S/N: 745052.70/83138030
Item 137 - 2002 L2, PCGS PR70DCAM, Great Britain, Iron Age Gold S-4570, S/N: 536321.70/81826396
Item 138 - 1981 Lesotho G500M Commonwealth Membership, PF 69 Ultra Cameo, S/N: 4214717-031
Item 139 - 1970-71 Burma MU, Patriotic Liberation Army, MS 69, S/N: 5702981-012
Item 140 - 1993 Cuba G200P, Bolivar & Marti, MS 69, S/N: 4476939-004
Item 141 - 2012 G. Britain, Charles Dickens, PF 70 Ultra Cameo, S/N: 4837558-010
Item 142 - 1978 150P, PCGS PR70DCAM, Botswana, Brown Hyena KM-13, S/N: 433290.70/34791110
Item 143 - 1975 Piefort France G20C, PF 68 Ultra Cameo, S/N: 4628817-004
Item 144 - 1978 \$300 PCGS MS67 Dominica, Independence-Arms, S/N: 467812.67/37474217
Item 145 - 2014 France G50E, Year of the Horse, PF70 Ultra Cameo, S/N: 2716258-019
Item 146 - 1998 Romania 500L, Romania Revolution, PF 67, S/N: 4088274-005
Item 147 - AH1395//1975 Jordan 1/4D, Gold off Metal Strike, PF 68 Ultra Cameo, S/N: 2807544-001
Item 148 - 50 Years of the 50P, 2019 Piefort G. Britain G50P, Kew Gardens, PF 69 Ultra Cameo, S/N: 2839907-002
Item 149 - 1928BP(2011) Hungary G100P, Restrike, PF 69 Ultra Cameo, S/N: 4842698-013
Item 150 - 1988 France GIO0=F, Spirit of the Bastille, Bi-Metallic, PF 70 Ultra Cameo, S/N: 3937631-069
Item 151 - 1679A France IL'OR, MS 63, S/N: 4494530-001
Item 152 - 1978 Piefort France 20, KM-P604 Gold, PF 68 Ultra Cameo, S/N: 3737362-006
Item 153 - AH1395//1975 Jordan 10F Gold Off Metal Strike, PF 67 Ultra Cameo, S/N: 2807544-003
Item 154 - AH1395//1975 Jordan 25F, Gold off Metal Strike, PF 68 Ultra Cameo, S/N: 2807544-006
Item 155 - 2014 France GIO0E, Charles the Bald's Denier, PF 70 Ultra Cameo, S/N: 2807664-007
Item 156 - 1621-31 Spain Tremissis Visigoth-Suinthila , Emerita, MS 64 (1.46g), S/N: 6323157-014
Item 157 - 1977 Piefort France 5C., KM-P571 Gold, PF 65 Ultra Cameo, S/N: 1521268-002
Item 158 - 1993 30K FR MS66, Elephant Equ.Guine, S/N: 145851.66/7643852
Item 159 - 2007 France G20E, The Little Prince Liens in the Grass, PF 69 Ultra Cameo, S/N: 4410930-007
Item 160 - 1993 Cuba G 1 00P Bolivar & Marti, MS 70, S/N: 5703465-029
Item 161 - 1991 Cuba GIO0P Queen Joanna, New World 500thAnniv., PF 70 Ultra Cameo, S/N: 2096648-021
Item 162 - AH1369//1950 Syria Pound, MS 65, S/N: 4346123-010
Item 163 - AH1397(1976) Oman G1R, Fort Buraimi, PF 66 Ultra Cameo, S/N: 4580751-010
Item 164 - 1975 Piefort France GIOF, PF 68, S/N: 2807544-010
Item 165 - 1979 Europa ECU European Economic Community - Silver, PL69, S/N: 2808490-004

Item 166 - 1981 Piefort France 20C, KM-P694 Gold, PF 67 Ultra Cameo, S/N: 3347655-004
Item 167 - 1995 France PT75E, Parthenon, PF 70 Ultra Cameo, S/N: 2824076-001
Item 168 - 1979 Piefort France GI/2F, PT 68, S/N: 4439612-001
Item 169 - 1978 Piefort France 1/2F, KM-P607 GOLD, PF 68, S/N: 3737362-005
Item 170 - AH1395//1975 Jordan 50F, Gold Off Metal Strike, PF 68 Ultra Cameo, S/N: 2807544-004
Item 171 - 1997 G. Britain GL2, Bi-Metallic Celtic Design, PF 70 Ultra Cameo, S/N: 2725675-015
Item 172 - AH1202//19 India Mohur, Bengal Presidency, Oblique Milling, MS 62, S/N: 5711832-014
Item 173 - AH1414//1993 Egypt G50P, Three Pyramids, PF 70 Ultra Cameo, S/N: 27932227-006
Item 174 - 2000 France GI00F, 20th Century, Physical Science, PF 70 Ultra Cameo, S/N: 2865988-001
Item 175 - 2000 France GI00F, 20th Century communications, PF70 Ultra Cameo, S/N: 2869082-002
Item 176 - 1997 10 Yn PCGS M69, china, People's Republic, Unicom Silver, S/N: 159703.69/38185372
Item 177 - 2016 G. Britain, Great Fire of London, 350th Anniversary, PF 70 Ultra Cameo, S/N: 5880640-015
Item 178 - 2019 G. Britain GL2, D-Day 75th Anniversary, PF 70 Ultra Cameo, S/N: 58806600-002
Item 179 - 50 Years of 50P, 2019 Piefort G. Britain G50P, Boy Scouts, PF 70 Ultra Cameo, S/N: 2839907-005
Item 180 - 1879-A 100Fr, PCGS MS64, France, Gad-1137 Anere Simper, S/N: 158184.64/83898242
Item 181 - Byzantine empire, Constantine X, AD 1059-67, AV Hist. Nomisma (4.44g) obv Christ std, rv Constantine, S/N: 4198091-00
Item 182 - 2007 France G50E, The Little Prince on His Planet, PF 70 Ultra Cameo, S/N: 4410930-008
Item 183 - Ah1413/1993 Oman GIR, Year of Youth, PF 70 Ultra Cameo, S/N: 2824907-006
Item 184 - 1982 CHI Dom. Rep. G200P, Year of the Child, PF 70 Ultra Cameo, S/N: 5865047-003
Item 185 - 2000 France GI00F, Louis d'or Louis XIII, PF70 Ultra Cameo, S/N: 5754217-006
Item 186 - 2000 France GI00F, 20th Century Flight, PF 70 Ultra Cameo, S/N: 4580776-002
Item 187 - 1997 France GI00F, World Cup-Ocenia, PF 70 Ultra Cameo, S/N: 3356544-080
Item 188 - 2000 France GI 00F, 20th Century The Automobile, PF 70 Ultra Cameo, S/N: 4580776-003
Item 189 - 1981 2000S PCGS PR69DCAM Tanzania, KM-15, S/N: 418425.69/37370395
Item 190 - 2000 G. Britain G50P, Public Library, PF 70 Ultra Cameo, S/N: 5481902-007
Item 191 - 1989 Cuba Group, Revolution 30th Anniv. Castro, PF 69 Ultra Cameo, S/N: 2096647-035
Item 192 - (AH725-752), India Tanka Sultans of Delhi, Mohammad III Bin Tuqhlaq, MS 64 (11.02 g) Balda Qutbad, S/N: 4929630-0
Item 193 - Ah1354//25 India AshrafHyderbad, MS 66, S/N: 4440971-001
Item 194 - 1980 Piefort France G 1 0C, PF 70 Ultra Cameo, S/N: 4657461-056
Item 195 - 1945 N.E. Indies 1/4G Gold Off metal Strike, PF 66+, S/N: 4623465
Item 196 - 1979 Piefort France G2F, PF 67, S/N: 443912-002

Item 197 - 1988 MW IO000Z PCGS PR68DCAM, Poland John Paul II 10th Ann. AU, S/N: 389322.68/37058064

Item 198 - 1975 Piefort France GI/2F, PF 69, S/N: 4628817-005

Item 199 - 2006 G. Britain G50P, Victoria Cross, PF 70 Ultra Cameo, S/N: 4882366-008

Item 200 - 2014 G. Britain G50P, Commonwealth Games Glasgow, PF 70 Ultra Cameo, S/N: 4628729-002

Item 201-Babylonia c.328-311 BC,AV Double-Daric(16.69g), Macedonian or Seleucid obv hero-king w/bow & spear,S/N:4883086-016

Item 202 - 1991 G.Britain 1/2 Sov, PF 70 Ultra Cameo, S/N: 2833314-009

Item 203 - 1987 Piefort France I00F, KM-P992 Gold, PF 69 Ultra Cameo, S/N: 2015842-010

Item 204 - 2004 G. Britain GL2, First Steam Locomotive, PF 70 Ultra Cameo, S/N: 4882365-019

Item 205 - 2002 France G20E Pinocchio, PF 70 Ultra Cameo, S/N: 3640947-093

Item 206 - 1986 G. Britain GL2, Commonwealth Games, PF 70 Ultra Cameo, S/N: 2810553-001

Item 207 - AH1395//1975 Jordan FILS, Gold Off Metal Strike; PF69 Ultra Cameo, S/N: 2807544-007

Item 208 - AH1407//1987 OMAN G25R WWF Masked Booby, PF 70 Ultra Cameo, S/N: 4580751-007

Item 209 - 2004 L2, PCGS PR70DCAM, Great Britain, Steam Locomotive Au S-K-17, 389140.70/36825054

Item 210 - 2017 France G200E Venus de Milo, PF 70 Ultra Cameo, S/N: 2820874-001

Item 211 - 1993 Cuba G200P Bolivar & Marti, PF 67 Ultra Cameo, S/N: 2771305-001

Item 212 - 1965 S Peso, Cuba X#M4RE, PCGS PR68DCAM 2003 S Clad IOC, PF70 Ultra Cameo, S/N: 605674.68/44098309

Item 213 - 1984 50 Ced, Ghana, F. A 0, Fisheries Conference, PM-P3 Piefort, PCGS PR68DCAM, S/N: 454142.68/45310483

Item 214 - 1983 Piefort France Ptl OF Montgolfier Balloon 200th Anniversary, PF 68 Ultra Cameo, S/N: 6022486-016

Item 215 - 1984 Ghana G50C, F.A.O. World Fisheries Conf., PF 69 Ultra Cameo, S/N: 4241525-006

Item 216 - 1985 Gold Cuba Peso, Souvenir - Long Neck Exile Fantasy Issue, PF 68 Ultra Cameo, S/N: 5859769-009

Item 217 - 1983 Piefort France Ptl OF Montgolfier Balloon, 200th Anniversary, PF 67 Ultra Cameo, S/N: 4333351-003

Item 218 - 1980 25 Tug Mongolia, Unicef Piefort, PCGS PR67DCAM, S/N: 403538.67/80103213

Item 219 - 1983 50 Met PCGS SP63 Mozambique, F.A.O. Piefort Silver, S/N: 719026.63/34300421

Item 220 - 1979 Piefort Jamaica \$10, KM-PI, Year of the Child, PF 68 Ultra Cameo, S/N: 3691966-007

Item 221 - 197 5 Venezuela S50B Conservation Giant Armadillo, PF 68 Ultra Cameo, S/N: 4632730-0002

Item 222 - 2003 S Clad 1 0C PF 70 Ultra Cameo, S/N: 1513141-031

Item 223 - Framed 1904 \$20 PCGS MS67, Series 70 Coin 134, S/N: 9045.67 /6555610

Item 224 - Framed ND (1992) \$25 PCGS PR69DCAM Brunei 25 Ann Accession & \$500 Coin 25th Ann. of Accession to Thr, S/N: 445872.69/44144283

Item 225 - Framed Ptolemaic Kingdom Ch XF AV Octodrachm (27.71 g) Issued c.mid-3rd Cent BC, S/N: 4882634-002

Item 226 - Framed 1982 Falklands G50P, NGC PF 69 Ultra Cameo, S/N: 6622395-001 & 1982 Falklands S50P, NGC PF 69 Ultra Cameo, S/N: 5861962-006

Item 227 - Framed 1914 Durango Peso, KM-622, PCGS MS65, S/N: 526755.65/43783629 & 1915 Mex-Chihuahua Peso, KM-619, PCGS MS64, S/N: 526730.64/18321533

Banknotes

Item 1 - PMG El Salvador, Banco Central, Pick #125a 1977-78 1 Colon, 67 EPQ Supereb Gem Unc, S/N: TQ 1006311

Item 2 - PMG Poland, National Bank "Commemorative", Pick #1 78a CM#201 2006 50 Zlotych, 69EPQ, S/N: JP0679383

Item 3 - PCGS SCWPM#83 26.9.1944-14.5.1952 1 Colon, El Salvador Republic 1942-44 Issue, Gem New, S/N: 4794846

Item 4 - PMG Bahamas, Central Bank, Pick#67 2000 100 Dollars - Printer TDLR, 67 EPQ Superb Gem Unc, S/N: M923062

Item 5 - PMG El Salvador, Banco Central de Reserva, Pick#134a 1983 5 Colones, 67 EPQ Superg Gem Unc, S/N: 3987646

Item 6 - PMG El Salvador, Banco Central de Reserva, Pick #85, 1943-52 10 Colones, 64 Choice, S/N: 1981685

Item 7 - PMG \$5 1861 Confederate States of America, CT-33. Contemporary Counterfeit, 62 NET, S/N: 8644

Item 8 - PMG Virginia, Richmond \$10 1862 Virginia Treasury Note VACR9 pp D, 64 EPQ Choice Uncirculated, S/N: 11073

Item 9 - PCGS Bahamas - Central Bank, 100 Dollars 2006, SCWPM #76a, Superb Gem New 67PPQ, S/N: C028038

Item 10 - PMG Italy, Banca d'Italia Pick 3118, 1997 500,000 Lire, Wrnk: Raphael, 64 Choice Uncirculated, S/N: GA417949B

Item 11 - PMG Romania, Banca Nationala, Pick #121 2005-15 100 Lei-Wrnk: L. Caragiale, 64 EPQ Gen, S/N: 151J0031802

Item 12 - PMG \$20 1861 Confederate States of America, CT-19. Contemporary Counterfeit pp A 63 EPQ, S/N: 4316

Item 13 - PMG \$10 1914 Federal Reserve Note New York, Fr#911b WhitelMellon pp C, 64 EPQ Choice, S/N: B57586027B

Item 14 - PMG \$10 1914 Federal Reserve Note Kansas City, Fr#940 BurkelMcAdoo pp D, 64 Choice, S/N: J3317452A

Item 15 - PCGS Fr. 911a 1914 \$10 Federal Reserve Note, Choice New 63PPQ Second Note of a Changeover, S/N: B49418037B

Item 16 - PCGS Fr.91 1b 1914 \$100 Federal Reserve Note Very Choice New 64PPQ, First Note of a Changeover Pair, S/N: B49418036B

Item 17 - PMG El Salvador "Printer's Essay" Pick 87pe 1950-54 1 Colon San Salvador, 66 EPQ Gem

Item 18 - PMG France, Banque de France, Pick #160a 1994-95 500 Francs-Wrnk:m Curie, 65 EPQ Gen, S/N: A031175569

Item 19 - PMG Sudan, Bank of Sudan "Specimen", Pick #29a 1984 L50, 66 EPQ Gen Uncirculated, S/N: G/1 000000

Item 20 - PSGS Fr. 2089-B 2004 \$20 Federal Reserve Note, Plate A102/125 Gem New 66PPQ, S/N: EB00000003H

Item 21 - PMG Poland-Lodz Ghetto, PO-565a SB1006a, 1940 20 Marks-Without Wrnk, 64 Choice, S/N: 256521

Item 22 - PMG Libya, Central Bank "Specimen", Pick #49s ND (1984) 1 Dinar Wrnk:Arms; 58EPQ Choice AboutUnc, S/N: 3 C/1000000247

Item 23 - PMG El Salvador "Specimen", Pick#85s 1943-52 10 Colones Printer ABNC, 67 EPQ Superb Gem Unc

Item 24 - PMG Oman, Central Bank, Pick#30a, 1985/AH1405 50 Rials, Wrnk: Sultan Q.bin.Sa'id, 66EPQ, S/N: B/1 774452

Item 25 - PMG Oman, Central Bank, Pick #21a ND (1977) 50 Rials Wrnk: Arms, 64EPQ Choice, S/N: A/2 996059

Item 26 - PMG Mozambique"Specimen" Pick #113s BNU MZ118s 1972 100 Escudos,Banco Nac, S/N: 0000000 423

Item 27 - PMG France, Banque de France, Pick#157a 1992 50 Francs-Wmk: Ade Saint-Exupery, 66 EPQ, S/N: M002178326

Item 28 - PMG Mexico,Banco de Mex "Specimen" Pick #126s 2010 500 Pesos-Printer:BdM, Wmk: D, S/N: A A0000000 0604

Item 29 - PCGS Mexico-Banco de Guanajuato 1 Peso 1913 SCWPM #S287a 3.12.1913, Extremely Fine 45, S/N: B-34956

Item 30 - PMG Mexico, Banco de Sonora "Specimen" Pick#S421s M509sl-2, ND;1897-1911 20 Pesos, 58EPQ Ch About Un, S/N: U 00000

Item 31 - PMG Mexico-Revolutionary, Estado de Chihuahua, Pick #S537b M926f 1915 20 Pesos, 63 Choice Uncir, S/N: K4958482

Item 32 - PMG Mexico "Contemporary Counterfeit" Pick #S1107ax M3974 1914 10 Pesos Veracruz, 25 Very Fine, S/N: C 1457334

Item 33 - PCGS SCWPM #34a ND *B-34956(1972) 1000 Dong, South Vietnam National Bank,Superb Gem New67PPQ, S/N: K6954839

Item 34 - PCGS New Hebrides-Institut d'Emission d'Outre-Mer,1000 Francs ND(1975) Nouvelles-Hebrides, SGM67PPQ, S/N: J.1 92436

Item 35 - PMG Saint Thomas & Prince, Banco Central, Pick #63b 2010 100,000 Dobras, 66 EPQ Gem Uncirculated, S/N: EA1428685

Item 36 - PMG Solomon Island, Central Bank "Replacement" Pick #30, FRI ND (2006) 100 Dollars 66 EPQ Gem Uncir, S/N: X/1 012699

Item 37 - PCGS Myanmar/Central Bank of Myanmar,Pick#83 ND(2014-2015)5000 Kyats-Wide Seg Sec Thr,Ch. Unc 64PPQ, S/N: GR8206025

Item 38 - PMG Viet Nam-South, National Bank, Pick #33a, ND (1972) 500 Dong, Wmk: Woman's Head, 66EPQ Gem Uncir, S/N: ES 601581

Item 39 - PMG Mauritius, Bank of Mauritius, Pick#30c, ND (1967) 5 Rupees-Printer TDLR; 65 EPQ Gem Uncir, S/N: A/47 305662

Item 40 - PCGS Indonesia-Bank Indonesia, 500 Rupiah 1982, SCWPM#121, Gem New 65PPQ, S/N: PCD017105

Item 41 - PCGS Myanmar-Central Bank, 10,000 Kyats ND (2012), SCWPM# 82, Gem New 65PPQ, S/N: BE4337859

Item 42 - PCGS Indonesia-Bank Indonesia 500 Rupiah 1977, SCWPM #117 Gem New 66PPQ, S/N: RJP037970

Item 43 - PCGS Indonesia-Bank Indonesia 20,000 Rupiah 1995, SCWPM#135a, Gem New 66PPQ, S/N: BGC196656

Item 44 - PMG Hong Kong, Gov of Hong Kong, Pick #324Ab, KNB19d-g 1956-59 1 Dollar 65 EPQ Gem Uncirculated, S/N: 6V 961668

Item 45 - PCGS France-Banque de France, 5 Nouveaux Francs 1959-65, SCWPM#141a 1.3.1962, Choice About New 58, S/N: C.84 72602

Item 46 - PMG El Salvador, Banco Central de Resv, Pick#135a, 1983 10 Colones-Printer ABNC, 67 EPQ Superb Gem Unc, S/N: IK0690046

Item 47 - PMG Mexico, Banco del Estado de Chihuahua, Pick#S132a M95a 1913 5 Pesos Printer ABNC, 30 Very Fine. S/N: A 115631

Item 48 - PMG Mexico-Revolutionary Pick #S1137 M4135a 1916 5 Pesos-Yucatan Teso. Gen. del Estado 15 Ch Fine, S/N: C 0229586

Item 49 - PMG Mexico, Banco del Estado de Chihuahua, Pick #S132 M95 1913 5 Pesos, Printer ABNC, 30 Very Fine, S/N: A 115632

Item 50 - PMG Maldives, Maldivian State, Pick#4a 1947/AH1367 5 Rufiyaa, Gov. Treasurer, 68 EPQ Superb Gem Unc, S/N: A293617

Item 51 - PMG South Carolina, Charleston \$3 1840s-70s Office of the South Carolina Railroad, SCS359, 64 ChUnc, S/N: 5638

Item 52 - PMG France, Banque de France, Pick #136b 1957-58 10,000 Francs 50 About Uncirculated, S/N: J.75 61432

Item 53 - PMG Italy, Insurgent Center UNL100 1967 100 Lira Printed by the Insurent Garibaldi, 65 EPQ Gem Uncir, S/N: 1906

Item 54 - PCGS Laos-Banque Nationale du Laos, 100 Kip ND (1957) SCWPM #6a, Gem New 66PPQ, S/N: C.12 54881

Item 55 - PMG El Salvador "Proof" Pick#S197fp ND (1929) 25 Colones El Banco Occidental 67 EPQ Superb Gem Unc

Item 56 - PMG Mexico Dollars of the World Scott & Company- 1881

Item 57 - PMG Mexico Coins of All Nations - Packed in Duke's Cigarites Knapp & Co. Lith, N.Y.

Item 58 - PMG Turkey "British Military Counterfeit" Pick #110x 1918/AH1334 10 Livres w/out Watermk, 64 ChUnc, S/N: A015132

Item 59 - PMG \$5 1907 Legal Tender, Fr #91 , SpeelmanWhite pp C, PCBLIC Error 58 Choice About Unc, S/N: M21665903

Item 60 - Four (4) Recon. Era South Carolina Currency Hoard, Superb Uncut Four Note Sheets dtd. 3/2/1872, Ch Crisp Uncut, S/N: 4446

Item 61 - Framed PMG NY, NY, CH#733, NB of Commerce in NY Radar Ser Num Fr#480, \$10 1882 Brown Back 68 EPQ SGU, S/N: 0871912/72727 pp E

Item 62 - Four (4) Framed Bank Notes (1933-37 100 Francs; 1955 (ND 1958) LS; 1963/AJ1382 L1/2; PCGS 1996-2002 5 Ringgit

Item 63 - Four (4) Framed PMG El Salvador Bank Notes

Item 64 - Framed PMG Montgomery, AL, Ch#1814, The First NB Fr.#422 \$10 1875 64 Choice Uncirculated, S/N: N978890N / 12485 pp C

Item 65 - Framed PMG Saint Pierre & Miquelon "Specimen" Pick #28s ND(1950-60)1000 Francs, 64 Choice Uncirculate, S/N: 0.000 00000

Item 66 - Framed PMG Texas, Austin \$10 1839-41 Republic of Texas TXCRA5 53 EPQ Choice Uncirculated, S/N: 5279 pp A

Item 67 - Framed PMG \$20 1990 Fed Res Note Boston Fr#2077-A (AC Blk)VillapandolBrady Solid #5s 65, S/N: A55555555C

Item 68 - Framed PMG El Salvador "Specimen" Pick#33a 18xx 5 Pesos Print:BWC, Deuda Pub. Del Sal. 64 EPQCh Unc, S/N: 22000
 Item 69 - Framed PMG Netherlands, Nederlandsche Bank, Pick#98 1985 (ND 1986) 250 Golden Print JEZ 68, EPQSGU, S/N: 4123015452
 Item 70 - Framed PMG Libya Treasury "Specimen" Pick #18s 1952 LIO Wmk:King Idris, 64 Choice Uncirculated, S/N: All 000000
 Item 71 - Framed PMG Costa Rica, Banco Internacional Pick# 167 1931-36 2 Colones, Printer W & S 64 Choice Uncir, S/N: B 875857
 Item 72 - Framed PCGS T-41 1862 \$100 Confederate States of America Choice About New 55PPQ, Plate Y w/serv.tags, S/N: 100500

Pokemon cards

Item 1 - 2022 Pokemon Swsh #212, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68090408
 Item 2 - 2022 Pokemon Swsh #212, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68388031
 Item 3 - 2022 Pokemon Swsh #212, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68876685
 Item 4 - 2022 Pokemon Swsh #212, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67942465
 Item 5 - 2022 Pokemon Swsh #212, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68090410
 Item 6 - 2022 Pokemon Swsh #131, GIRATINA VSTAR GEM MT, Lost Origin 10, S/N: 68295468
 Item 7 - 2022 Pokemon Swsh #212, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67551165
 Item 8 - 2022 Pokemon Swsh #212, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68373243
 Item 9 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68381360
 Item 10 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68876684
 Item 11 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68347843
 Item 12 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68587331
 Item 13 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67551161
 Item 14 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67551162
 Item 15 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68665422
 Item 16 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67551160
 Item 17 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67742919

Item 18 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67795146

Item 19 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68902224

Item 20 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68313474

Item 21 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67821843

Item 22 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67955282

Item 23 - 2022 Pokemon Swsh #201, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 67689268

Item 24 - 2022 Pokemon Swsh #185, FA/GIRATINA VSTAR GEM MT, Lost Origin - Secret 10, S/N: 68347844

Item 25 - 2022 Pokemon Swsh #185, FA/GIRATINA V GEM MT, Lost Origin 10, S/N: 68216960

Item 26 - 2022 Pokemon Swsh #185, FA/GIRATINA V GEM MT, Lost Origin 10, S/N: 68364482

Item 27 - 2021 Pokemon SWSH #173, FNSuiCUNE V GEM MT, Evolving Skies 10, S/N: 64644504

Item 28 - 2021 Pokemon SWSH #173, FNSUICUNE V GM MT, Evolving Skies 10, S/N: 64384345

Item 29 - 2018 Pokemon Sun & Moon #71, F.A./Reshiram GX GEM MT, Dragon Majesty-Secret 10, S/N: 47727632

Item 30 - Rev 9 Mint, RCG, FNMAGCARGO GX, 2018 Pokemon Sun & Moon, Lost Thunder Secret #218, S/N: 1837456601

Item 31 - 2022 Pokemon SWSH #180, FA/AERODACTYL V GEM MT, Lost Origin 10, S/N: 67843511

Item 32 - 2022 Pokemon SWSH #180, FA/AERODACTYL V GEM MT, Lost Origin 10, S/N: 67821163

Item 33 - 2022 Pokemon SWSH #184, FA/GLRN.PERRSERKER V GEM MT, Lost Origin 10, S/N: 67621675

Item 34 - 2022 Pokemon SWSH #184, FA/GLRN.PERRSERKER V GEM MT, Lost Origin 10, S/N: 68357538

Item 35 - 2022 Pokemon SWSH #184, FA/GLRN.PERRSERKER V GEM MT, Lost Origin 10, S/N: 67761609

Item 36 - 2022 Pokemon SWSH #184, FA/GLRN.PERRSERKER V GEM MT, Lost Origin 10, S/N: 67551150

Item 37 - 2022 Pokemon SWSH #184, FA/GLRN.PERRSERKER V GEM MT, Lost Origin 10, S/N: 69243082

Item 38 - 2022 Pokemon SWSH # 186, FA/lugia V GEM MT, Silver Tempest 10, S/N: 69449320

Item 39 - 2022 Pokemon SWSH #177, FA/ROTOM V GEM MT, Lost Origin 10, S/N: 67621680

Item 40 - 2021 Pokemon SWSH #183, FA/SYLVEON V GEM MT, Evolving Skies 10, S/N: 64384346

Item 41 - 2022 Pokemon SWSH #TG 16, FA/PIKACHU V GEM MT, Lost Origin 10, S/N: 67551137

Item 42 - 2022 Pokemon SWSH #204, FA/AREZU GEM MT, Lost Origin-Secret 10, S/N: 67642938

Item 43 - 2017 Pokemon Sun & Moon # 109, FA/Gladion GEM MT, Crimson Invasion 10, S/N: 47727705
 Item 44 - 2018 Pokemon Sun & Moon #162, F.A/Bill's Maint. GEM MT, Celestial Storm 10, S/N: 47727677
 Item 45 - 2021 Pokemon SWSH #123, FA/DURALUDON VMAX GEM MT, Evolving Skies 10, S/N: 64441166
 Item 46 - 2021 Pokemon SWSH #186, FA/MEDICHAM V GEM MT, Evolving Skies 10, S/N: 65486051
 Item 47 - 2018 Pokemon Sun & Moon, F.A.Pheromosa GX GEM MT, Ultra Prism-Secret 10, S/N: 47727646
 Item 48 - 2012 Pokemon B & W#85, RAYQUAZAEX GEM MT, Dragons Exalted IO, S/N: 64548893
 Item 49 - 2022 Pokemon JPN.SWSH #104, FNROTOM V GEM MT, Lost Abyss 10, S/N: 67155329
 Item 50 - 2018 Pokemon Sun & Moon # 172, F .A./LUNALA GX GEM 10, Ultra Prism-Secret 10, S/N: 41291807
 Item 51 - Two (2) Framed 2022 Pokemon SWSH #186 F.A./GiRATINA V Lost Ori&2021 Pokemon SWSH #216 F.A./Umbreon VMAX Evol Sk, S/N: 6772822 & 68741162

Military memorabilia

Item 1 – Original German WWII Army Infantry Officer Captain’s Uniform with Awards
 Item 2 – WWII German Officer’s Hat: SS Officer’s Allgemeine Visor Cap, Black Wool w/ Black velvet center band
 Item 3 – El Salvador Presentation Sword – German Solingen Made “Double Lion Head” w/ shegreen grip

Posters, prints, and historical documents

Item 1 – Guadalupe Victoria document signed, three pages, March 7, 1829. H-11.75” x W-8.25”
 Item 2 – Elvis Presley signed paper, and inscribed, “To Sherry, Love ya” framed next to promo photo #1681B
 Item 3 – Frank Worth (American, 1923-2000) Photo of Marilyn Monroe, on set of How to Marry a Millionaire 1953
 Item 4 – After Henri Matisse Poster – Matisse, Papiers Decoupees created for 1953 exhibition
 Item 5 – Johann Baptiste Homann & Heirs (1664-1724), 18th c. German map of Paris
 Item 6 – Vintage WWII Poster THE ENEMY IS ON THE JOB EVERY DAY Are You?
 Item 7 – Sam Houston Autographed Letter Signed. Two pages w/ blank integral 8”X10”.
 Item 8 – Maximillien de Robespierre Document signed “Robespierre”. Paris; June 21, 1793
 Item 9 – Adolf Hitler signed document, title Im Namen des Reichs with typed letter regarding med personnel
 Item 10 – Georges Danton (1759-1794) Signed Decree. Two pages issued by the National Assembly on June 8, 1792.
 Item 11 – WWI Recruitment Poster “Enlist Today U.S. Marines” by J.C. Leyendecker (1874-1951), circa 1917
 Item 12 – WWI Poster: American Red Cross/Our Boys Need Sox/Knit Your Bit
 Item 13 – Vintage 1938 German Propaganda poster calling on Australians to vote “Yes” in support of Annexation

- Item 14 – Charles Dickens (1812-1870) signed letter on Gad Hill Place Stationary, Higham by Rochester, Kent
- Item 15 – WWII Poster 1943 by Bradshaw Crandell (1896-1966) “Are you a girl with a Star-Spangled Heart?”
- Item 16 – Pele Autographed Soccer Jersey with PSA/DNA Authentication Cert 4A63429
- Item 17 – Pele (1940-2022) Autographed Photo SFC Pennant PSA/DNA Certification #U85521
- Item 18 – Circle of Ferdinand Georg Waldmuller (Austrian, 1793-1865) Portrait of a Boy
- Item 19 – James Montgomery Flagg (1877-1960) WWII Propaganda Poster 1945 US Govt Printing office
- Item 20 – Louis XIII Manuscript Doc Signed “Louis” as the 13 year old King of France, April 7, 1614.
- Item 21 – Augustus Saint-Gaudens autographed Letter of February 16th, no year stated, on stationary
- Item 22 – Emile Zola autographed letter and envelope. From Medan, Paris, France; August 12, 1886
- Item 23 – WWI Propaganda Poster by Lentz ca 1917. “H-o-o-old your Horses!!! The Tanks are coming!”
- Item 24 – WWI British Recruiting Poster “Answer Now in Your Country’s Hour of Need” Edgar James Kealey artwork
- Item 25 – WWI British Recruiting Poster #107 “It’s our Flag – Fight For It – Work For It” 1915
- Item 26 – WWI British Recruitment Poster 1915 “REMEMBER THE LUSITANIA! ENLIST TODAY”
- Item 27 – WWI Recruitment Poster 1916 “They Mutilate: For Humanity’s Sake Enlist” N Beringer Artwork
- Item 28 – WWI Canadian Recruitment Poster “Heroes of St. Julien and Festubert...Shall we follow their example?”
- Item 29 – WWI Irish Recruitment Poster 1915 “Can You Any Longer Resist the Call?” Printed by McCaw.
- Item 30 – WWII British Recruiting Poster 1915 “There is still a place in the line for you. Will you fit?”
- Item 31 – WWI British War Loan Poster “Back the Empire with your Savings, Invest Now”
- Item 32 – WWI British French-Language Poster B&W, “Orphenlinat Des Armees” Frank Brangwyn 1867-1956
- Item 33 – Th. Smid (Artist) WWI Poster, Tableau d’Histoire de France Serie: La Guerre 1916
- Item 34 – WWI French Poster “Comptoir National D’Escompte de Paris. Emprunt National 1918”
- Item 35 – WWI Poster Il Cibo Vincera la Guerra! (Foot Will Win the War!), ca. 1917 Charles E. Chambers artist
- Item 36 - WWII British Recruiting Poster, Make Nursing Your War Job – It’s War Work with a Future.
- Item 37 - Maurice Toussaint (1882-1974) Troupes Metropolitaines (ca 1930s) French Recruitment Poster
- Item 38 - Movie Poster by N. Morgillo artist 1908 The Passion Play Starring Kristina Soderbaum
- Item 39 - Tadeusz Trepkowski (1914-1954) artist. Polish Anti War Poster 1952 Nie (NO!) From MOMA
- Item 40 - Official US War Films (Committee of Public Information) Poster

Item 41 - WWI Propaganda Poster “Under Four Flags” US Committee on Public Information, 1918

Item 42 - WWI Recruitment Poster 1916 “They Mutilate: For Humanity’s Sake Enlist” N. Beringer Artwork